UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MOHAMMAD YOUSEF HASNA,
a/k/a "Orhan Korkmaz,"
a/k/a "Abu Al-Baraa,"

Defendant.

26 MAG 2982

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 2339B, 2339C, and 3238

SOUTHERN DISTRICT OF NEW YORK, ss.:

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

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

1. From at least in or about 2014, up to and including the date of this Complaint, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to a foreign terrorist organization, namely, Hamas, which was designated by the U.S. Secretary of State as a foreign terrorist organization on or about October 8, 1997, pursuant to Section 219 of the Immigration and Nationality Act, and is currently designated as such as of the date of the filing of this Complaint.

2. It was a part and an object of the conspiracy that MOHAMMAD YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant, and others known and unknown, would and did knowingly provide Hamas with material support and resources, including property, services, facilities, personnel (including themselves), and transportation, knowing that Hamas was a designated terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that Hamas engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that Hamas engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(C), (d)(1)(D), (d)(1)(E), and (d)(1)(F), and 3238.)

COUNT TWO
(CONSPIRACY TO FINANCE TERRORISM)

3. From at least in or about 2014, up to and including the date of this Complaint, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to provide and collect funds, directly and indirectly, with the intention and the knowledge that they were to be used, in full or in part, to carry out a terrorist act, to wit, any act intended to cause death and serious bodily injury to a civilian, and to any other person not taking an active part in hostilities in a situation of armed conflict, the purpose of which, by its nature and context, was to intimidate a population, and to compel a government to do and to abstain from doing any act, and where the object of such offense was directed toward and resulted in attempted terrorist attacks against nationals of the United States and any person or property within the United States.

(Title 18, United States Code, Sections 2339C(a)(1)(B), (a)(2), and (b)(2)(C)(iii), and 3238.)

COUNT THREE
(FINANCING TERRORISM)

4. From at least on or about 2014, up to and including the date of this Complaint, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant, did unlawfully and willfully provide and collect funds, by any means, directly and indirectly, and attempt to do so, with the intention and the knowledge that such funds were to be used, in full or in part, to carry out a terrorist act, to wit, any act intended to cause death and serious bodily injury to a civilian, and to any other person not taking an active part in hostilities in a situation of armed conflict, the purpose of which, by its nature and context, was to intimidate a population, and to compel a government to do and to abstain from doing any act, and where the object of such offense was directed toward and resulted in attempted terrorist attacks against nationals of the United States and any person or property within the United States.

(Title 18, United States Code, Sections 2339C(a)(1)(B), (a)(2), and (b)(2)(C)(ii), (iii), 2, and 3238.)

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

5. I am a Special Agent with the FBI, assigned to investigate national security matters, including counterterrorism investigations involving crimes against the United States and U.S. citizens occurring outside the United States, counterproliferation investigations, and investigations of export violations, including illicit Iranian finance and procurement. Based on my training and experience, I have become knowledgeable about criminal activity, particularly violations of the federal terrorism statutes. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers and other individuals, and upon my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses cited

above, it does not include all the facts that I have learned during this investigation. Where the contents of conversations with others and statements by others are reported herein, they are reported in substance and in part, except where otherwise indicated. Some of the information recounted below is based on draft translations of statements written or spoken in Arabic, which are subject to revision, and in some cases, I have indicated my interpretation of certain words or phrases in brackets, which interpretations are based on the context in which they appear as well as, among other things, my training and experience. To the extent dates and times are listed herein, they are approximate. Finally, to the extent there are grammatical, typographical, or spelling errors in any quotations in this affidavit, those errors appear in the original quoted material.

I. Overview

6. As described below, MOHAMMAD YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant, used his senior role at a purported global humanitarian organization (the "Sham Charity") to raise funds and provide financing and commodities to Hamas, a designated foreign terrorist organization ("FTO"), in the Gaza Strip. HASNA coordinated extensively with individuals at the highest levels of Hamas to raise funds, as well as to procure and transport commodities and materials to Gaza. In Gaza, HASNA turned funds and materials over to Hamas leaders or distributed them at the direction of Hamas leaders. HASNA also manipulated photographs and documents to conceal from the public and potential donors that Hamas was the actual beneficiary of his fundraising and to obfuscate the true nature of his purportedly humanitarian work.

7. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of publicly available information, and my training and experience, I have learned, among other things, the following about MOHAMMED YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant:

a. HASNA is a resident of Turkey.

b. From in or about 2009 to in or about May 2017, HASNA was the Gaza coordination office director at the Humanitarian Affairs Department of the Organization of the Islamic Cooperation ("OIC"). According to open-source information, the OIC is the world's second-largest intergovernmental organization, after the UN, with a membership of 57 states spread over four continents.

c. In or about August 2018, HASNA became a regional director of the Sham Charity. Since in or about October 2023, HASNA has been the global director of the Sham Charity, and has been primarily based in Turkey. As described below, HASNA has used the Sham Charity as a front organization through which he has provided supplies and other resources directly to Hamas in Gaza and for the benefit of Hamas and its leaders and members.

d. HASNA is a longtime supporter of Hamas. Among other things, HASNA has posted on one of his personal social media accounts images and messages glorifying terrorists in the Izz al-Din al-Qassam Brigades (the "al-Qassam Brigades"), including images and

messages honoring al-Qassam Brigades fighters who were killed in connection with their terrorist activity.[1] For example:

i. On or about October 4, 2014, HASNA posted an image of a young man in a green shirt, green scarf, and green headband—a manner of dress that I recognize, from my training and experience, to be frequently worn by Hamas supporters and associated with Hamas—and holding an assault rifle; other armed men are visible in the background. HASNA's accompanying comment reads, in Arabic, "#The_Uprising_Has_Begun. Occupation forces [Hamas's term for Israeli military or law enforcement] are besieging the home of Al-Qassam fighter Qais Al-Saadi; clashes are underway at the scene." According to public sources, Israeli forces attempted to capture or kill al-Saadi, a leader within Hamas's Al-Qassam Brigades, at his West Bank family home in or about October 2015 and later arrested him in response to Hamas and Palestinian Islamic Jihad attacks on Israeli civilians and police officers in Jerusalem and the West Bank.

ii. On or about March 14, 2015, HASNA posted a digital flyer to his social media account advertising a "Hamas speaks" social media campaign, which advertised that one of the participants would be Rawhi Mushtaha. Mushtaha was among the founding members of Hamas and joined the Hamas Politburo in approximately 2012. Mushtaha was designated on or about September 8, 2015 by the U.S. Department of State as a Specially Designated National ("SDN") under Executive Order 13224, relating to global terrorism. According to public reports, Mushtaha became head of Hamas in Gaza in or about 2024 and was killed in an Israeli military operation in or about July 2024.

iii. On or about April 17, 2015, HASNA posted an image of Hamas leader Abdelaziz Rantisi holding a microphone in one hand and an AK-47 assault rifle in the other, standing in front of men wearing white sheet masks and black headbands with Arabic writing. HASNA's accompanying comment reads, in Arabic, "Abdelaziz Rantisi: This is the path. Address the enemy in the language he understands. It is only one death. It is only one death. Let it rather be martyrdom." According to public reports, Rantisi was one of the founders of Hamas and the terror organization's leader for approximately one month following the death of Hamas founder Ahmed Yassin and until Rantisi's own death in approximately April 2004.

iv. On or about January 28, 2016, HASNA posted an image of two armed militants kneeling in an underground tunnel, wearing military-style camouflage, black balaclavas covering their faces, and headbands that I recognize, from my training and experience, to be the type worn by Al-Qassam Brigades terrorists, *see infra* ¶ 10(g). HASNA's accompanying comment reads, in Arabic, "Seven dreams that ascended to the highest heights; seven heroes who sacrificed their lives and dreams for a free homeland and for liberation. Blessings upon you for

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

attaining martyrdom; your blood serves as beacons along the path to freedom . . . .” The comment concluded with the hashtags “#Tunnel_Men” and “#Martyrs_of_Praparation.” HASNA later re-posted a comment from alqassam.ps, which is Hamas’s official website. The re-posted message read, “The Al-Qassam Brigades mourn a handful of ‘tunnel men’—heroic Mujahideen from the Tuffah and Daraj Battalion—who were martyred during the battle of preparation . . . .” From my training and experience and my participation in this investigation, I know that Hamas constructed an extensive network of tunnels in Gaza beneath civilian areas, including using schools, hospitals, and non-governmental organization facilities as access points or civilian cover. According to news reports, Hamas tunnels collapsed in or about January 2016 from poor construction and flooding, killing approximately seven Hamas militants. In the wake of the collapse, then-Hamas leader Ismail Haniyeh, *infra* ¶ 10(j)(i), publicly stated that Hamas would continue to build its tunnel network and rocket inventory in preparation for armed conflict with Israel.

e. As described further below, HASNA coordinated extensively with, and took direction and instruction from, Ghazi Hamad (“Hamad”)[2], a high-level Hamas leader. HASNA and Hamad have worked together to coordinate the delivery of purported humanitarian aid organized by or allocated to the Sham Charity into Gaza for Hamas’s benefit, repeatedly coordinating the delivery of supplies, food, and other items by HASNA (under the guise of humanitarian aid from the Sham Charity) directly into Hamad’s and Hamas’s hands.

A. Ghazi Hamad’s Leadership Role in Hamas

8. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of publicly available information, documents, and reports, and my training and experience, I have learned, among other things, the following:

a. Hamad is a longtime senior leader of Hamas who has, for decades, worked with other leaders of Hamas to further Hamas’s stated goal to eliminate the State of Israel, including by retaliating against the United States and attempting to weaken American support for Israel through terrorist attacks targeting Americans, among others. Hamad has served multiple roles within Hamas, including as Deputy Foreign Minister; as an adviser to then-Hamas leader Haniyeh, *see infra* ¶ 10(j)(i); a participant in negotiations between Hamas and Israel that resulted in the 2011 release of approximately one thousand Palestinian prisoners, including a number of Hamas terrorists who went on to hold leadership positions in Hamas, in exchange for Hamas’s release of a kidnapped Israeli soldier who had been held hostage for more than five years; and, currently, a member of Hamas’s Politburo and an official spokesperson for the terrorist organization. Hamad is also the head of the Ministry of Social Development in Gaza (“MoSD”), an agency nominally part of the Gaza governing apparatus that is in fact controlled by Hamas, including through Hamad’s oversight of the ministry.

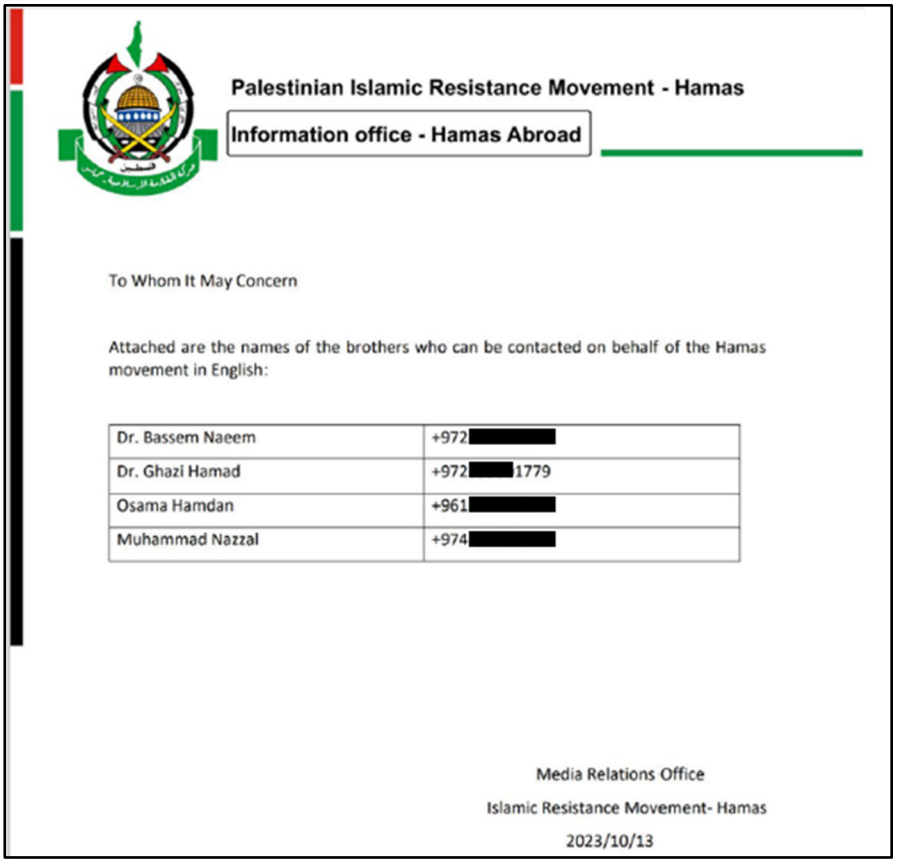
b. On or about November 19, 2024, the U.S. Department of State designated Hamad as a Specially Designated Global Terrorist (“SDGT”) under Executive Order 13224. In announcing Hamad’s designation, the Department of State noted that Hamad “is a long-time Gaza-based Hamas leader who served as the editor of Hamas propaganda outlets and is authorized to speak publicly on behalf of Hamas. In addition to these public facing and propaganda

[2] From my review of publicly available information, I am aware that Hamad frequently refers to himself as “Dr. Ghazi Hamad,” and that others call him “Doctor.”

roles, Hamad previously served as a Hamas senior official overseeing border crossings at Gaza. While these border crossings were one of the primary ways Hamas smuggled weapons into Gaza, these crossings were also used to smuggle the construction equipment and materials Hamas needed to build an extensive tunnel network they intentionally interspersed among Palestinian civilians."[3]

c. In Hamad's role as head of MoSD, Hamad was one of the primary Hamas representatives who interacted with the United Nations Relief and Works Agency ("UNRWA"), a United Nations ("UN") agency charged with carrying out relief programs for Palestinian refugees.

d. On or about October 13, 2023—that is, less than a week after Hamas committed its worst atrocities to date (the "October 7 Hamas Massacres"), *see infra* ¶ 16—a message on what appears to be official Hamas letterhead, addressed "To Whom It May Concern," was posted to Hamas's official "Media Relations Office" social media account. The message states, "[a]ttached are the names of the brothers who can be contacted on behalf of the Hamas movement in English." The message listed, among others, Ghazi Hamad and included Hamad's phone number, which had a country code for Gaza and the West Bank (the "Hamad Number"). Below is a copy of the social media post:



Palestinian Islamic Resistance Movement - Hamas

Information office - Hamas Abroad

To Whom It May Concern

Attached are the names of the brothers who can be contacted on behalf of the Hamas movement in English:

Dr. Bassem Naeem	+972[redacted]
Dr. Ghazi Hamad	+972[redacted]1779
Osama Hamdan	+961[redacted]
Muhammad Nazzal	+974[redacted]

Media Relations Office

Islamic Resistance Movement- Hamas

2023/10/13

e. On or about October 24, 2023, less than three weeks after the October 7 Hamas Massacres, *see infra* ¶ 16, Hamad participated in an interview broadcast on a

[3] https://home.treasury.gov/news/press-releases/jy2720

Lebanese television station. During the interview, Hamad rejected the State of Israel's existence, stating that "Israel is a country that has no place on our land. We must remove that country, because it constitutes a security, military, and political catastrophe to the Arab and Islamic nation, and must be finished." Later in the interview, the interviewer clarified whether Hamad was calling for the end of Israeli control in the Gaza Strip, and Hamad responded: "No, I am talking about all the Palestinian lands." The interviewer clarified again, "Does that mean the annihilation of Israel?" Hamad responded, "Yes, of course." During the interview, Hamad also insisted that Hamas would repeat the October 7 Hamas Massacres: "The Al-Aqsa Flood [Hamas's name for the October 7 Hamas Massacres] is just the first time, and there will be a second, a third, a fourth, because we have the determination, the resolve, and the capabilities to fight. Will we have to pay a price? Yes, and we are ready to pay it. We are called a nation of martyrs, and we are proud to sacrifice martyrs."

f. On or about October 25, 2023, Hamad participated in an interview broadcast on Al-Manar television, a television broadcast controlled by the FTO Hizballah.[4] During the interview, Hamad stated that it was the duty of Lebanon, Syria, Jordan, and "all the Arab countries" to "liberate Palestine." Hamad went on to falsely claim that the October 7 Hamas Massacres were directed at soldiers and military bases and not civilians, when in fact the primary targets of the Massacres were residential communities and a music festival.

g. On or about November 20, 2024, in an interview broadcast on a Qatari television network, Hamad stated that Hamas had never accepted a two-state solution, referring to decades-long negotiations aiming to establish a sovereign Palestinian state neighboring Israel that recognized Israel's sovereignty and borders. Hamad stated that "resistance is our only pathway," referring to terrorism and armed attacks, "to eliminate this occupying, criminal, fascist country," referring to the elimination of Israel as a state and establishment of an Arab Muslim nation occupying the geographical region Israel-Palestine.

h. On or about August 2, 2025, in an interview broadcast on a Qatari television network, Hamad defended the October 7 Hamas Massacres, claiming that they "yielded . . . important historic achievements" for "the Palestinian cause." Hamad further made clear that "we, as Palestinians, will not surrender our weapons," asserting that "[o]ur weapons equal our cause."

B. Overview of the Sham Charity

9. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of publicly available information, and my training and experience, I have learned, among other things, the following:

a. The Sham Charity is an international non-governmental organization that was founded in or about 2003 and purports to be among the largest Muslim

[4] Hizballah is a Lebanon-based Shia Islamic organization with political, social, and terrorist components. Hizballah was founded in the early 1980s with support from Iran after the 1982 Israeli invasion of Lebanon, and its mission includes establishing a fundamentalist Islamic state in Lebanon. In 1997, the State Department designated Hizballah an FTO, pursuant to Section 219 of the INA, and it remains so designated today. In 2001, pursuant to Executive Order 13,224, the U.S. Department of the Treasury designated Hizballah a SDGT.

charities in the world. In or about 2005, the Sham Charity expanded its focus from Islamic education to emergency relief work.

b. In or about 2009, the Sham Charity acquired a television network, which it uses to broadcast Islamic-based content, to conduct fundraising for purported charitable initiatives, and to generate commercial advertising income.

c. According to annual reporting from the Charity Commission for England and Wales, in the fiscal year ending July 31, 2025 (FY2025), the Sham Charity's reported total gross income was approximately $100 million U.S. dollars (USD), with reported expenditures for "Charitable activities" of approximately $91.4 million USD. The Sham Charity's reported total gross income nearly doubled following the October 7 Hamas Massacres—from approximately $41.8 million USD in FY2023, to approximately $81.56 million USD in FY2024.

II. Background on Hamas

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

A. Hamas's Founding, Structure, and Objectives

a. Hamas was founded in 1987 by Sheikh Ahmed Yassin as an outgrowth of the Palestinian branch of the Muslim Brotherhood. Hamas, which is sometimes referred to by its followers as "The Movement" or "The Resistance," is a terrorist organization based principally in the Gaza Strip and Palestinian West Bank territories. In June 2007, Hamas staged a military takeover of the Gaza Strip and, following intense fighting with the Palestinian Authority, took complete control of the region. Accordingly, since 2007, Hamas has exercised *de facto* control of Gaza, and any "government" agencies in Gaza are part of Hamas.

b. From its inception, Hamas's stated purpose has been to create an Islamic Palestinian state in place of Israel by eliminating the State of Israel through violent holy war, or jihad. Hamas has not only directed its violence and terrorism against Israeli targets in furtherance of that goal; Hamas's leaders have also assailed the United States and Americans in retaliation for and in an effort to weaken American support for Israel's right to exist and defense of that right. Hamas has murdered and injured dozens of Americans as part of its campaign of violence and terror, and since 1997, Hamas has been designated as an FTO by the United States Government.

c. Hamas has pursued its objectives through terrorist attacks and other acts of brutal violence, including launching thousands of rockets specifically targeting civilian populations; suicide bombings of restaurants, markets, public transportation systems, and other public spaces; military-style attacks on towns and residential communities; and the widespread use of human shields, particularly civilian Palestinian populations, to deter and constrain military responses to its terrorism. Hamas's campaign of terrorism has killed and wounded citizens of Israel, the United States, and many other countries.

d. In 1988, Hamas issued a charter, formally known in English as the "Covenant of the Islamic Resistance Movement," which identified Hamas as the Muslim

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

e. In 2017, Hamas issued a revised charter, entitled in English as "A Document of General Principles & Policies." The revised charter asserts that "Palestine," by which Hamas means the territorial area of Israel, the West Bank, and Gaza, "is a land that was seized by a racist, anti-human and colonial Zionist project that was founded on a false promise." The charter also codifies Hamas's commitment to violence, which Hamas calls "armed resistance," explaining that "resisting the occupation," *i.e.*, the State of Israel, "is a legitimate right guaranteed by divine laws and by international norms and laws," and that "[a]t the heart of these lies armed resistance[.]" Shortly after Hamas issued its revised charter, one of its leaders stated that "the new document will undermine neither our principles nor our strategy."

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

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

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

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

j. Up to the present, Hamas and its leaders have continued to espouse the destruction of Israel as Hamas's core purpose, and the use of murder and other acts of violent terrorism against Israelis and those who support Israel, including Americans, as its principal means of accomplishing that objective. As a central component of that mission, Hamas leaders have specifically called for retaliation against the United States in response to U.S. support of Israel's existence. For example:

i. After Haniyeh became the leader of the Politburo, he made numerous public statements in support of Hamas attacks and calling for further attacks on Israeli and American interests.[5] For example, on or about December 7, 2017, Haniyeh gave a speech that was broadcast live on a Qatari television network. During the speech, Haniyeh declared that Hamas's "first priority . . . is to declare, once and for all, that the so-called [Israeli-Palestinian] peace process is dead and buried." Haniyeh also threatened the United States in retaliation for the U.S. announcement on December 6, 2017, that the United States would relocate the American Embassy from Tel Aviv to Jerusalem, stating: "the American decision is an act of aggression against our people. It is a declaration of war against our Palestinian people."

ii. On or about December 22, 2017, Hamas spokesman Abd Al-Qadir Al-Hawajiri spoke at a Hamas rally that was broadcast on a Hamas media outlet. In his speech, Al-Hawajiri condemned American support for Israel, proclaiming that the "entity [*i.e.*, Israel] will cease to exist, as will America."

iii. On or about May 21, 2020, an interview with then-senior Hamas leader Saleh Al-Arouri ("Al-Arouri") was broadcast on a Lebanese television station.[6] In the interview, Al-Arouri stated that Hamas was "standing at the doorstep" of conducting further attacks on Israel that he described as "the explosion of a massive Intifada." Al-Arouri specifically cited U.S. diplomatic measures as a cause for Hamas's violence, referring to "the American

[5] Haniyeh was the Chairman of Hamas's Politburo from 2017 until his death. According to public reports, including announcements by Hamas, Haniyeh was killed in Tehran, Iran on or about July 31, 2024, while visiting Tehran to attend the swearing-in of Iran's President. On or about September 3, 2024, a criminal complaint was unsealed in this District, charging Hamas leaders Haniyeh, Yahya Sinwar ("Sinwar"), Mohammad al-Masri, a/k/a "Mohammad Deif" ("al-Masri"), Marwan Issa ("Issa"), Khaled Meshaal ("Meshaal"), and Ali Baraka ("Baraka") with various material support and terrorism charges arising from, among other things, their leadership roles in Hamas and their roles in the October 7 Hamas Massacres. *See United States v. Haniyeh et al.*, 24 Mag. 438. Since that complaint was filed, according to public reports—including announcements by Hamas—Sinwar, al-Masri, and Issa have also been killed. Meshaal and Baraka are still believed to be alive and at large.

[6] Al-Arouri served as a senior leader of Hamas throughout much of its history. Beginning in or about 1993, Al-Arouri was a founder of the al-Qassam Brigades and continued to serve as a key leader in that component of Hamas. From approximately 2017 until his reported death, Al-Arouri served as the Deputy Chairman of Hamas's Politburo and played a key role in overseeing Hamas's relationships with the Government of Iran and Hizballah. According to public reports, including announcements by Hamas, Al-Arouri was killed on or about January 2, 2024, along with several other leaders of the al-Qassam Brigades, in a targeted strike conducted in the Hizballah stronghold of Dahiyeh, a suburb of Beirut, Lebanon.

declaration that the U.S. recognizes Jerusalem to be the entity's [*i.e.*, Israel's] capital, as well as to America's recognition of the legality of the settlements."

iv. On or about May 12, 2021, an interview with Al-Arouri was broadcast on Al-Aqsa TV. In the interview, Al-Arouri described recent Israeli airstrikes against Hamas in response to Hamas's attacks on Israeli civilians as purportedly having been conducted with munitions provided by the United States, and asserted that: "this is just so everybody knows that America is fighting us directly, on the ground." Al-Arouri further described Hamas's efforts to acquire advanced weaponry, stating that Hamas "has been getting rid of its surplus of old rockets. We had a problem with the old rockets that we had prepared but we have much better ones now . . . We can now empty the launching pads, to make room for the powerful and accurate modern missiles. Therefore, the more time goes by, the intensity of the resistance against the occupation will increase." Al-Arouri also described Hamas's objectives "to hit deep in the enemy's own turf, and to shatter the enemy's morale and the morale of its people." Al-Arouri went on to describe the roles of other Hamas leaders, stating: "the resistance was designed to last for a long while. The commanders of the resistance in Gaza have said—brother Abu Ibrahim [*i.e.*, Yahya Sinwar] said it clearly more than once, and 'Abu Khaled' Deif [*i.e.*, Al Masri] also talked about it . . . They said that we are ready for a war that would last months."[7]

v. In the wake of the October 7 Hamas Massacres, on or about October 28, 2023, Hamas released a recording of a portion of a press conference held in Lebanon by senior Hamas leader Ghazi Hamad. Hamad specifically addressed the United States's support for Israel, stating: "the U.S. Administration and the Western countries supporting the aggression are full partners with the occupation in the genocidal war and the cascade of blood that flows from defenseless civilians. This blood will be a curse and a volcano of fury from the masses of our Ummah [*i.e.*, the Muslim community] and the free people of the world against these killers."

vi. Similarly, in an interview broadcast on the internet by a Lebanese media outlet on or about November 2, 2023, Baraka praised offers of support for Hamas from the leader of the Democratic People's Republic of Korea ("North Korea"), because North Korea "does have the capability to strike America. The day may come, when North Korea intervenes, because it is, after all, part of [our] alliance." Baraka continued to claim: "all of America's enemies in the region [including Hamas, Iran, North Korea, China, and Russia] are consulting and getting closer, and the day may come when they join the war together, and turn America into a thing of the past."

vii. In an interview broadcast on a Hamas media outlet on or about December 2, 2023, senior Hamas leader Marwan Muhammed Abu Raas condemned American support for Israel, asserting that "[t]here isn't a single crime that the U.S. has not committed against Gaza. May Allah settle the score with America, and may He take revenge on that criminal Nazi country."

[7] Sinwar was the leader of Hamas in the Gaza Strip from in or about 2017 until his reported death on or about October 16, 2024, in Gaza, and was one of the founders of the al-Qassam Brigades. Al-Masri was the commander in chief of the al-Qassam Brigades from approximately in or about 2002 until his reported death. According to public reports, Al-Masri was killed on or about July 13, 2024, in a targeted strike conducted in Gaza.

viii. On or about December 5, 2023, in an interview broadcast on Al-Aqsa TV, senior Hamas leader Sami Abu Zuhri called for retaliation against American support for Israeli military operations in response to the October 7 Hamas Massacres, claiming that America is "the enemy" and "must pay the price," and stating: "the Al-Qassam Brigades are doing what they must do, and the people of Gaza are as steadfast as they must be. . . . Now it is our nation's turn to pressure the Americans to stop this war. We need violent acts against American and British interests everywhere, as well as the interests of all the countries that support the occupation."

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

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

12. On October 31, 2001, the U.S. Secretary of State also designated Hamas as an SDGT under Executive Order 13224.

13. On March 18, 2010, OFAC designated Al-Aqsa TV as an SDGT under Executive Order 13224, describing it as "a primary Hamas media outlet" that "airs programs and music videos designed to recruit children to become Hamas armed fighters and suicide bombers upon reaching adulthood."

C. Terrorist Attacks by Hamas

14. Since the founding of the al-Qassam Brigades, Hamas has carried out numerous terrorist attacks, principally in Israel. These attacks have killed thousands of innocent victims and wounded thousands more, including U.S. citizens.

15. Among others, Hamas has carried out the following terrorist attacks:

a. In early 1996, Hamas suicide bombers killed 45 people in separate attacks on two buses on Jaffa Road in Jerusalem. First, on or about February 25, 1996, a Hamas suicide bomber blew himself up on a bus traveling down Jaffa Road near the Jerusalem Central Bus Station, killing 17 civilians and nine Israeli soldiers. Approximately one week later, on or about March 3, 1996, a second Hamas suicide bomber boarded another bus in Jerusalem and detonated an explosive belt that killed 16 civilians and three Israeli soldiers. Three U.S. citizens were killed in these attacks. Hamas publicly claimed credit for both suicide attacks.

b. On or about July 30, 1997, two Hamas suicide bombers detonated explosive devices in an open-air market in Jerusalem, killing approximately 16 civilians and injuring approximately 178 more. A U.S. citizen was killed and another U.S. citizen was wounded in the attack.

c. On or about September 4, 1997, three Hamas suicide bombers detonated explosive devices at a pedestrian mall in Jerusalem, killing approximately five civilians and wounding more than 180 others. A U.S. citizen was killed and ten U.S. citizens were injured in the attack.

d. On or about August 9, 2001, a Hamas suicide bomber detonated an explosive device at a pizzeria in downtown Jerusalem, killing approximately 16 civilians and wounding more than 130 others. Two U.S. citizens were killed and four U.S. citizens were injured in the attack.

e. On or about March 27, 2002, a Hamas suicide bomber detonated an explosive device at the Park Hotel in Netanya, Israel, during a Passover seder, killing approximately 30 civilians and injuring approximately 140 others. 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 stated afterward that "[t]his is a trial [*i.e.*, a precursor attack] to send a letter," *i.e.*, to send a message, "to 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 such 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, killing nine civilians. Five U.S. citizens were killed and four U.S. citizens were injured in the attack. Hamas claimed responsibility for the terrorist attack during celebrations that followed in Gaza City within the Gaza Strip. Also during these celebrations, Haniyeh, then-Hamas's leader, made a statement warning that if Israel attacked Palestinian children, Israel "will have to expect to drink from the same poison."

g. On or about June 12, 2014, Hamas operatives kidnapped three teenagers, including one U.S. citizen, in Gush Etzion in the West Bank between Jerusalem and Hebron, Israel. On or about June 30, 2014, the bodies of the three teenagers were found buried just north of Hebron; all three had been shot and killed. On or about August 20, 2014, al-Arouri, former Deputy Chairman of Hamas's Politburo, delivered a speech at a conference in Istanbul, Turkey, which was broadcast on a Qatari television station, in which he discussed the abductions. 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[8] 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.

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

h. On or about October 1, 2015, Hamas gunmen murdered an American-Israeli citizen and his wife in their car near the Palestinian village of Beit Furik in the West Bank. The couple'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 terror attack" and called for more "quality attacks."

i. On or about September 8, 2025, Hamas claimed responsibility for a shooting that killed at least six Israelis at a bus stop in Jerusalem. The victims ranged from 25 to 79 years old.

16. On October 7, 2023, Hamas committed its most violent terrorist attack to date—the October 7 Hamas Massacres—when it sent more than 2,000 armed terrorists into farms and towns in southern Israel, where they carried out the massacres of over a thousand people and the kidnappings of more than 250 others.

a. Specifically, 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. Armed Hamas operatives drove into Israel and attacked and shot civilians, including with machineguns, at point blank range, carrying out massacres in areas in southern Israel, including at a music festival in the Negev desert and at residential communities known in Hebrew as "kibbutzim." Specifically, 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 attacked several Israeli communities, the border city of Sderot, and two Israeli military bases. Hundreds of civilians, including Americans, and Israeli soldiers were killed; others, including Americans, were kidnapped, taken hostage, and brought into Gaza by Hamas. 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.

b. In connection with the initiation of the October 7 Hamas Massacres, the supreme military commander of the al-Qassam Brigades, Al-Masri 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 Massacres—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."

III. Hamas's Covert Financing of Its Terrorist Activities

17. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of publicly available information, and my training and experience, I have learned, among other things, the following:

a. Hamas finances its terrorist activities through various means, including direct state sponsorship from the Government of Iran, global investment portfolios, taxation in Gaza, and diversion of legitimate humanitarian aid. Among the means Hamas uses to

secure funding are sham charities, which purport to be independent entities, but which are in fact affiliated with, and in some cases controlled by, Hamas.[9]

b. Because they are seemingly independent of Hamas, these sham charities protect Hamas, its financing, and those supplying Hamas with funding from law enforcement scrutiny, seizures, and arrests.

c. Hamas facilitators transfer resources, including commodities, services, lodging, facilities, money, and personnel, into the Gaza Strip. In some cases, the provision of support is concealed under the guise of humanitarian efforts being conducted by the sham charities.

IV. The Defendant's Material Support to Hamas

18. From my review of voice notes and documents sent via an encrypted chat application between MOHAMMAD YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant, and Hamad[10] (at an account using the Hamad Number, *see supra* ¶ 8(d)), I am aware that HASNA and Hamad discussed Hamas-related matters, including logistics for providing purported humanitarian aid into Gaza using the Sham Charity and other sham charities in Hamas's network, and payments for those goods. For example:

a. Hamad and HASNA discussed obfuscating the true recipient of goods HASNA transported into Gaza by manipulating videos and pictures of the goods to omit identifying signs and other information. For example, on or about July 26, 2024, Hamad sent a voice note to HASNA, asking: "Abu al-Baraa, is it possible for you to send me video footage of

[9] The U.S. Department of the Treasury has identified and designated numerous sham charities engaged in fundraising for Hamas. *See, e.g.*, "Treasury Continues to Disrupt Hamas' Sham Charity Network as the Group Refuses to Disarm" (Mar. 12, 2026), *available at*: https://home.treasury.gov/news/press-releases/sb0415; "Treasury Exposes and Disrupts Hamas's Covert Support Network" (Jan. 21, 2026), *available at*: https://home.treasury.gov/news/press-releases/sb0368; "Treasury Disrupts Sham Overseas Charity Networks Funding Hamas and the PFLP" (June 10, 2025), *available at*: https://home.treasury.gov/news/press-releases/sb0162; "Treasury Targets Significant International Hamas Fundraising Network" (Oct. 7, 2024), *available at*: https://home.treasury.gov/news/press-releases/jy2632; "U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities" (Aug. 22, 2023), *available at*: https://home.treasury.gov/news/press-releases/js672.

[10] From my participation in this investigation and my review of records, I am aware of the following among other things: (a) HASNA is the user of a phone number with a Turkey country code, ending in 9200 (the "HASNA 9200 Number"); (b) the HASNA 9200 Number was saved in Hamad's contact list (stored in a cloud account associated with the Hamad Number) as "محمد حسنة ج 2 تركيا", which translates as "Mohammed Hasna – Part 2 – Türkiye;" (c) the HASNA 9200 Number is the Google Meet (*i.e.*, web-based video conferencing) number associated with HASNA's email address at the Sham Charity's domain; and (d) the HASNA 9200 Number is a verification number for a Google account having an email address that includes HASNA's. During the voice notes, HASNA refers to Hamad as "Doctor," and Hamad refers to HASNA as "Abu al-Baraa."

the parcels, but without showing the signs that are showing there, so they don't understand that this is for something else, just show the picture of the parcels and the people packing and so on and so forth, but do not show the signs that are inside. May God be pleased with you, it is urgent, yeah." From my training and experience, my review of these voice notes, and my participation in this investigation, I understand Hamad to mean that HASNA should take pictures and videos of humanitarian parcels delivered from HASNA via the Sham Charity that do not show signs, markings, or other indicators of the true recipients for those materials—meaning Hamas. HASNA replied, "God willing, no problem. Our quota of seven trucks has arrived, so we will schedule to take them next week, God willing."

b. On or about July 30, 2024, HASNA sent a voice note to Hamad about an order the Sham Charity had placed with a purported Jordanian charity (the "Jordanian NGO") for approximately 20,000 food parcels and transportation of those goods into Gaza. Specifically:

i. HASNA said, "We had placed the order of the 20,000, I did tell you there are 5,000 hygiene parcels I will order, alright? And I will take the 5,000 food parcels. But I sent you the invoice because we had already ordered them, so it's difficult for me to cancel with the [Jordanian NGO]." The message thread between HASNA and Hamad included an invoice from the Sham Charity to the Jordanian NGO, dated the prior day, as shown in part below:

Date: 29/07/2024

Claim No. 244/24

Att./ **[The Sham Charity]**

Please find hereby our claim for Food Parcel Project for Gaza as per you letter dated 23/07/2024 as agreed.

Amount in (USD)	Description
661,500	20,000 food parcel
66,000	Transportation to Gaza 30 trucks
727,500	**Total**

In words: Seven Hundred Seventy-Two Thousand Fife Hundred Sixty Dollar

With Kind regards,

Director – Finance Department

ii. HASNA then sent a voice note, assuring Hamad: "we had an agreement between you and me, and I am committed to this agreement."

iii. From my training and experience, my review of these voice notes and this invoice, and my participation in this investigation, I understand HASNA to have been informing Hamad that HASNA had already submitted an invoice from the Sham Charity to the Jordanian NGO for 20,000 food parcels, so HASNA could not formally alter that order, but

that HASNA would divert approximately 5,000 of those food parcels to satisfy a prior agreement between HASNA and Hamad regarding HASNA delivering 5,000 items (whether hygiene or food) to Hamad.

c. In or about October 2024, Hamad and HASNA exchanged voice notes about the logistics of transporting purported humanitarian consignments into Gaza using, among other locations, warehouses apparently belonging to the Sham Charity, the Jordanian NGO, and the MoSD. For example:

i. On October 28, 2024, HASNA apparently sent Hamad two lists, and then followed up with the following voice note: "The first list is these eight trucks, these are in our warehouse. The second list is these Jordanian trucks stuck in Al-Arish [in Egypt]. Of course, if they can take the three Jordanian trucks that are stuck, this would do us a favor regarding the waiting issue and the payments that will be paid for them, I mean."

ii. The next day, HASNA sent voice notes to Hamad about the status of the goods, telling Hamad: "[o]ur brother spoke with me and I sent him the list of trucks and their details." HASNA then said: "they are saying warehouses, I mean there is this . . . this guy who is talking a lot from [the Jordanian NGO]. Okay. Ah, but he is saying MoSD. Now the guys called MoSD and they are saying maybe the Agency's warehouses. Anyway, the guys will look for them tomorrow morning and see how things go."

iii. HASNA then forwarded Hamad a voice note from an unidentified individual I understand from the context of the messages to be associated with the Jordanian NGO, in which the individual tells HASNA that "[c]onvoy 112 that arrived today in Gaza is currently located in the MoSD warehouses. It is very necessary, very necessary to coordinate with the Consignee or the receiving parties so they go today, right now, to the MoSD warehouses and tell them that this donation is ours [*i.e.*, the Jordanian NGO's]. Everyone should tell the MoSD there that these goods belong to them [*i.e.*, the Jordanian NGO]. Very necessary today."

iv. From my training and experience, my review of these voice notes, and my participation in this investigation, I understand that these messages reflect HASNA and Hamad's joint efforts to successfully bring goods into Gaza, using Hamas's sham charity network, for the ultimate benefit of the MoSD (*i.e.*, Hamas), while concealing the true distribution network of the goods.

d. On or about November 3, 2024, HASNA sent Hamad a voice note about a planned event jointly hosted by the Sham Charity and a Turkish entity. Specifically, HASNA told Hamad: "[W]e are organizing a conference on the 29th-30th of November in Turkey called 'Gaza the Day After' with the Turkish Diyanet delegation.[11] We wanted to invite UN institutions, but unfortunately, I don't have access to them. I expected the Diyanet delegation to have access. So, I know that you have contact with the United Nations, the Red Cross, and details

[11] From my review of open-source information, I am aware that the Sham Charity held this purported international humanitarian forum and call-to-action initiative in or about November 2024, in coordination with the Türkiye Diyanet Foundation and other organizations. *See* https://tdv.org/en-EN/tdv-is-set-to-host-the-international-gaza-humanitarian-aid-summit/

like that. Is it possible to share their numbers with me so we can send them invitations?" From my training and experience, my review of these voice notes, and my participation in this investigation, I understand HASNA to have been asking Hamad to leverage Hamad's connections among large aid organizations to promote a Sham Charity-sponsored initiative, and from my review of open-source information, I am aware that the conference did in fact take place in late November 2024.

e. On or about November 29, 2024, HASNA sent Hamad voice notes about the transportation arrangements for the purported humanitarian aid, expressing his efforts to conceal the Sham Charity's involvement. For example:

i. HASNA said: "I didn't say that he should take the items to the MoSD warehouses. What I said is he takes them in the name of MoSD and puts them in our warehouse, and the database is from you. If they go to your warehouses, I won't be able to film or take the picture I want. I have a neat warehouse rented for 60,000 dollars, and a special staff appointed for it." From my training and experience, my review of these voice notes, and my participation in this investigation, I understand HASNA to mean that, while the goods were intended for Hamas-associated recipients identified by Hamad and should be earmarked for MoSD, the goods needed to be delivered to "our" (*i.e.*, the Sham Charity's) warehouse so that HASNA could take videos or photos of the parcels in a warehouse marked with the Sham Charity's logo. This method of deception is consistent with the earlier messages about the Jordanian NGO claiming ownership over goods that had been delivered to an MoSD warehouse.

ii. HASNA then expressed frustration with another member of Hamas's sham charity network, asking, "Why is he coming to test on me? Tomorrow, 25 trucks . . . 18 trucks out of the 25 are mine as [the Sham Charity]. Well, if a problem happens, do I end up eating it [taking the blame] in this matter? I have two warehouses, Doctor, each warehouse . . . consider this warehouse his warehouse, I mean I have no problem. But the goods are unloaded at my place. Why would they be unloaded in warehouses I don't know, and our guys won't be able to control the picture the way they want?" This message is consistent with the earlier messages about manipulating photos and videos of aid to obfuscate the true distribution network.

iii. HASNA further complained, "I mean, when he has 18 out of 25, meaning the largest share and the largest amount currently entering the north of the Strip is [the Sham Charity], so it is unacceptable for me to be the guinea pig. I am supposed to deliver my goods in order to prove my credibility with the people, my ability to execute, and my ability to control. If he wants to do a trial run, let him do it with someone else, and after that, the system that runs on everyone will run on me. But for me to be cooked up [used as a test case], no." From my training and experience, my review of these voice notes, and my participation in this investigation, I understand HASNA to mean that HASNA had used the Sham Charity to facilitate the transportation into Gaza of 18 trucks for another person who wanted to distribute the cargo from those trucks in a manner that was outside HASNA's ability to control the appearances. HASNA preferred that a system for clandestinely distributing the cargo, apparently to Hamas, be tested somewhere else and, if it worked, HASNA would use the same system ("the system that runs on everyone will run on me").

iv. HASNA then explicitly confirmed the arrangement, telling Hamad: "[W]e take the names from you too, meaning from you. Meaning this also places a responsibility on me regarding the sacrificial meat that is present. Meaning, if the trucks were

taken and distributed without going to the people, or went down to the market, I am at [the Sham Charity] on the front line. I have an office, I have two central computerized warehouses, and put whatever names you want." From my training and experience, my review of these voice notes, and my participation in this investigation, I understand HASNA to mean that HASNA had used the Sham Charity as cover to facilitate the transportation of goods into Gaza on behalf of another organization, and for recipients Hamad identified, which put HASNA at risk because he did not control how those goods were distributed and would not be able to conceal if they were obviously distributed to Hamas "without going to the people" or were sold in the market, rather than distributed as the Sham Charity's humanitarian aid.

f. Between in or about November and December 2024, HASNA and Hamad had further discussions about sending truckloads of purported humanitarian aid into Gaza under the name of the Sham Charity, to be sent to warehouses controlled by Hamas's sham charity network before onward distribution into Gaza for the benefit of Hamas. For example, in a voice note dated November 4, 2024, HASNA said: "Today, four trucks entered for us. I just sent to you, I don't know if you want me to enter them under the name of [the Sham Charity], so see." And in a subsequent message, HASNA told Hamad: "I informed them it's commercial, but I want to purchase it as charity, meaning just so if they speak with him or whatever, or communication happens, he should say, 'I sold it for charity.' When it arrives, it will be fine." From my training and experience, my review of these voice notes, and my participation in this investigation, I understand HASNA to mean that he had falsely represented incoming delivery trucks that entered Gaza "for us" (*i.e.*, for the benefit of Hamas) as transporting the Sham Charity-provided humanitarian aid in order to conceal their true nature as trucks transporting commercial merchandise that would be sold to generate profits for Hamas.

g. HASNA and Hamad also communicated about payments for goods they transported into Gaza for the benefit of Hamas, via the Sham Charity or otherwise, including USD-denominated financial transfers. For example:

i. On or about December 14, 2024, HASNA sent a voice note to Hamad about money, asking Hamad to have another individual send him bank account information for payments: "Doctor, I sent it to you as is, like I received it. The important thing is that he sends me both accounts, the dollar and the shekel, so whatever is available in the account, we can send it. If it is dollars, then it is dollars; if it is shekels, it will be at today's exchange rate."

ii. HASNA also arranged cash deliveries to Hamad personally. For example, in a voice message dated on or about August 9, 2024, HASNA informed Hamad that HASNA had arranged for another individual to deliver $3,000 USD to Hamad.

iii. The message thread between HASNA and Hamad also included a ledger for approximately July 2024 through July 2025, which itemizes "Incoming" funds totaling approximately 5,258,000[12] and "Expenses" totaling approximately 3,124,937. Only two of the "Incoming" entries included remarks—one listed as from "The office" and another as from "Lebanon." The "Expenses" were all itemized, with details reflecting money being paid to

[12] From my review of documents and voice notes exchanged among HASNA and Hamad, my training and experience, and my participation in this investigation, I believe it is most likely that these sums reflect USD.

specifically named individuals, as well as "transfer percentage(s)," apparent commissions, and the "Civil protection department." The largest collective expenses were funds totaling 700,000 that were described on the ledger as "In Dr.'s hand." From my training and experience, my review of voice notes and documents, and my participation in this investigation, I understand this ledger to reflect that "the Doctor" (*i.e.*, Hamad) personally received approximately $700,000 USD of the approximately $5.258 million USD incoming funds for that year.

h. HASNA and Hamad also discussed Hamas-related current events. For example:

i. On or about August 25, 2024, among a series of voice notes HASNA and Hamad exchanged discussing transporting goods into Gaza, HASNA said that another purported charity headquartered in the United States had proposed that it buy the goods and then resell them to the Sham Charity with a slight fee, and said:

> So if they buy at the same prices offered to us and add their percentage that is related to their administrative fees or something like that, I expect this to be a logical and suitable solution. I mean, better than, for example, you get involved in the end and link [the Sham Charity] to this line we are working on, so this is better. Especially since he was wary of/concerned about us because of the Israelis when they announced a while ago that [the Sham Charity] is a terrorist organization and killed Zaker, our office manager in Gaza in an airstrike that targeted him directly. So what do you think? Should we give him/them the number of the merchant in Hebron?

From my training and experience, my review of this voice note, and my participation in this investigation, I understand HASNA to be coordinating with Hamad and others in Hamas's sham charity network to, among other things, have another organization purchase goods from merchant(s) on behalf of the Sham Charity, in order to conceal the Sham Charity's provision of those goods for the benefit of Hamas following Israel's designation of the Sham Charity as a terrorist organization.

ii. On or about February 3, 2025, HASNA sent a voice note to Hamad conveying "advice from one of the knowledgeable brothers in Malaysia," which HASNA indicated he had also learned from a different source: "The Malaysians imposed a blockade on the wounded, restricted their movement, and limited the places they can go to. They didn't even give them residencies/stays. If there is no special treatment and special arrangement regarding the captives and their freedom of movement, then Malaysia is not recommended, aside from the fact that it is originally a country where Fadi Al-Batsh was assassinated, and many cadres were attacked/assaulted there." From my training and experience, my review of these voice notes, and my participation in this investigation, I understand HASNA to be passing along information he learned from other Hamas members (*i.e.*, "brothers"); specifically, that Malaysia was not a safe country for Hamas members at that time, including, among other reasons, because Fadi Al-Batsh—whom I know from public reporting to have been a Palestinian scholar and avowed Hamas member who was killed in 2018—had been targeted there.

* * *

WHEREFORE, I respectfully request that a warrant be issued for the arrest of MOHAMMAD YOUSEF HASNA, a/k/a "Orhan Korkmaz," a/k/a "Abu Al-Baraa," the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

FURTHER, the Government respectfully moves for the Complaint and arrest warrant to remain sealed—with the exception that the Complaint and arrest warrant are unsealed for the limited purpose of disclosing the existence of or disseminating the Complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant's arrest, extradition, or expulsion, or as otherwise required for purposes of national security.

/s/ Erica Dobin, by the Court with permission
ERICA DOBIN
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of this Complaint by reliable electronic means, pursuant to Federal Rule of Criminal Procedure 4.1, this 24th day of July, 2026.

RTarnofsky
THE HONORABLE ROBYN F. TARNOFSKY
United States Magistrate Judge
Southern District of New York