

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Karen Rinehart, being duly sworn on oath, depose and state that I have been employed as a Special Agent with the Federal Bureau of Investigation since April 11, 2021, and I am currently assigned to the West Tennessee Violent Crimes Task Force.

AGENT BACKGROUND

1. Affiant has been a sworn Special Agent with the Federal Bureau of Investigation and have been since April 11, 2021. I am currently assigned to the Federal Bureau of Investigation's West Tennessee Violent Crime Task Force and have been since September 2021. I am statutorily charged with investigating violations of federal laws, to include bank robbery, interference with commerce by threats of violence (Hobbs Act robberies), the Fugitive Felon Act, kidnapping, and other violent crime matters.

2. Prior to working for the Federal Bureau of Investigation, I worked for Immigration and Customs Enforcement as an Enforcement and Removal Operations officer. Prior to working for Immigration and Customs Enforcement, I was a detective with the Trumann Police Department. During my time, I participated in multiple violent crime investigations. During these investigations, I have conducted and/or participated in victim and suspect interviews and drafting and execution of search warrants.

3. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7) and am empowered by law to conduct investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officials and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge

about this matter. Based on the facts set forth in this affidavit, there is probable cause to believe that **Abed-AI Majid Awwad (AWWAD)** committed violations of **18 U.S.C. § 875(c)** and **18 U.S.C. § 2261A**.

STATEMENT OF PROBABLE CAUSE

4. The United States, including **The Federal Bureau of Investigation**, is conducting a criminal investigation of **AWWAD** regarding possible violations of **18 U.S.C. Code § 875 (c)** and **18 U.S.C. § 2261A**.

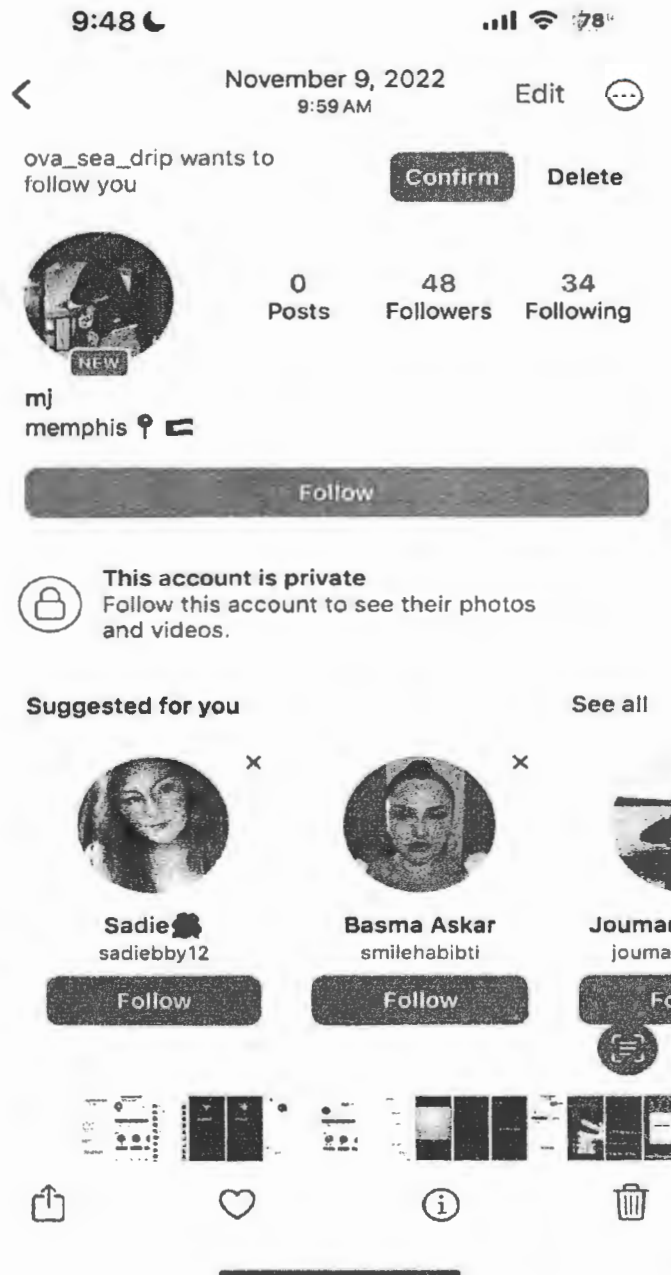
5. On October 3, 2024, FBI Phoenix provided information regarding possible threats to FBI Nashville, Memphis RA.

6. FBI Phoenix advised the following: Between October 5, 2022, to present, **AWWAD** allegedly harassed and threatened **Deena Alsadi (Deena)** and **Hana Alsadi (Hana)** utilizing various social media platforms. **AWWAD** resides in Germantown, Tennessee. **Deena** and **Hana** reside in Chandler, Arizona. The Chandler Police Department took multiple police reports documenting **AWWAD**'s harassment of **Deena** and **Hana**. The messages included killing **Deena** and **Hana** and sexually assaulting them. The Chandler Police Department had approximately six reports related to the allegations.

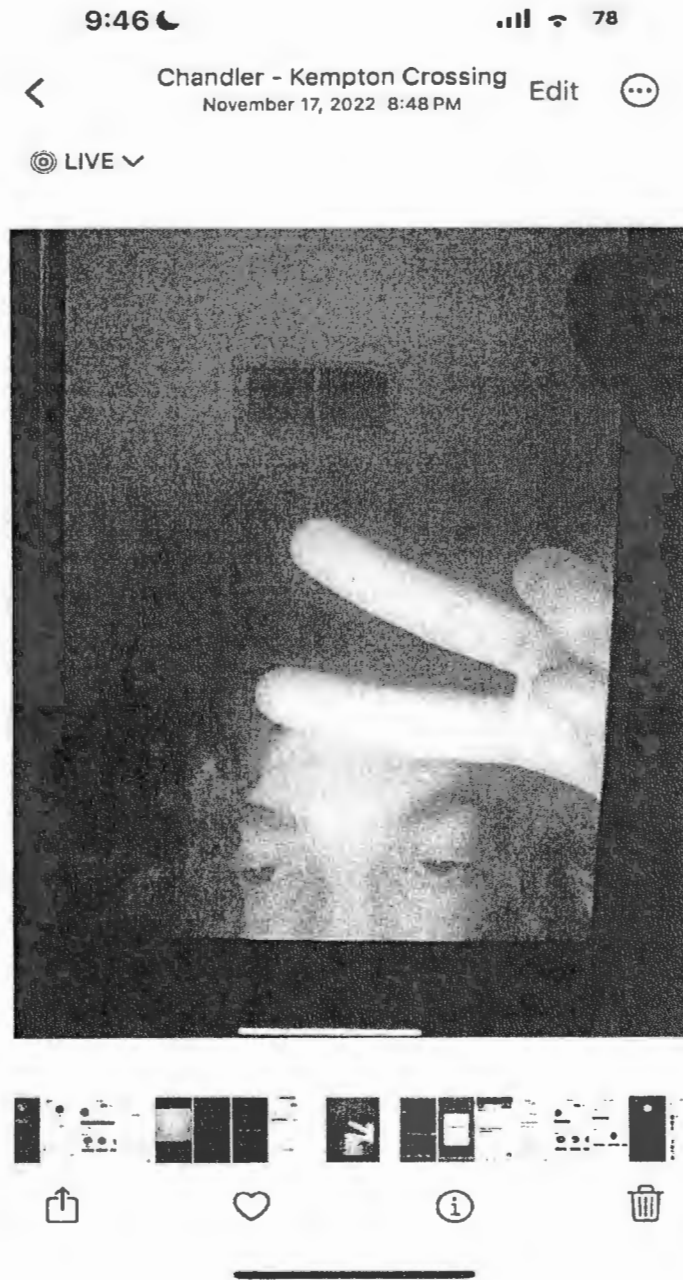
7. On October 3, 2024, **Deena** and **Hana**'s attorney, **Alfredo Richard**, provided FBI Nashville, Memphis RA with approximately one hundred and sixty-six screenshots of harassing and threatening messages and comments. The messages were from multiple accounts that had been deactivated shortly after the messages were sent.

8. On October 4, 2024, Special Agent **Rinchart** conducted a phone interview with **Deena** and **Hana** in the presence of their attorney. **Hana** stated in 2022 an Instagram profile requested to follow her profile. **Hana** initially communicated with the profile and the user of the

profile advised his name was Abed-Al Awwad. The Instagram account listed the profile as being in Tennessee:



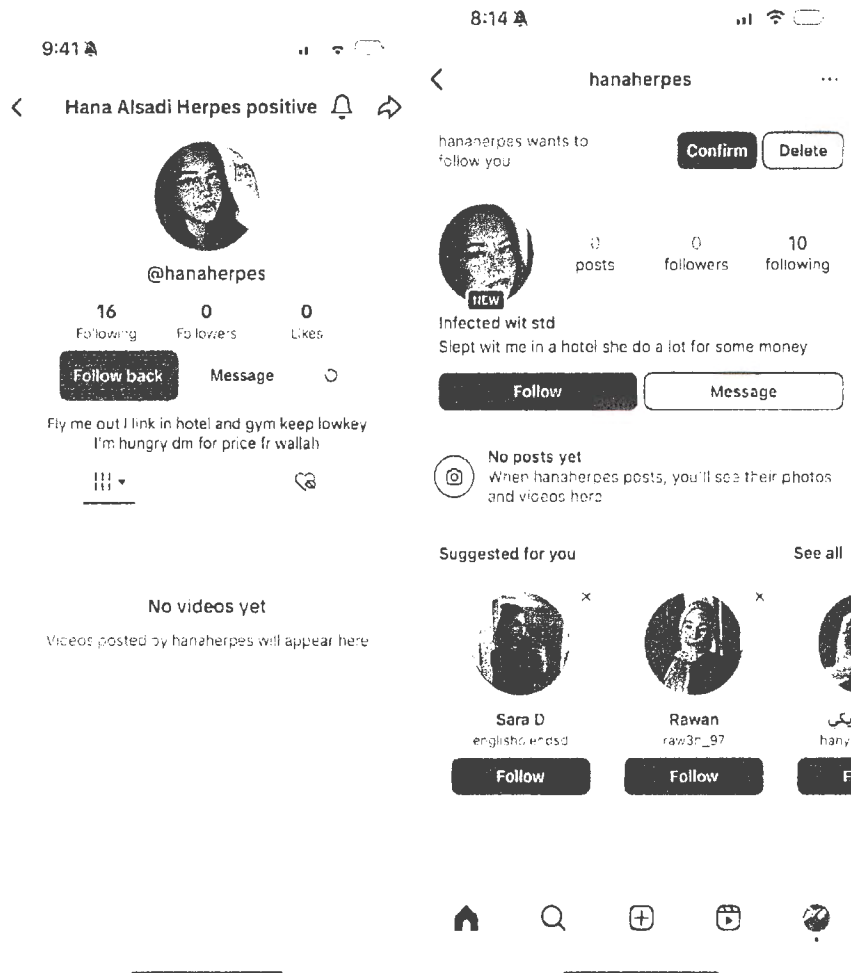
9. The user of the profile also sent Hana a photograph of himself:

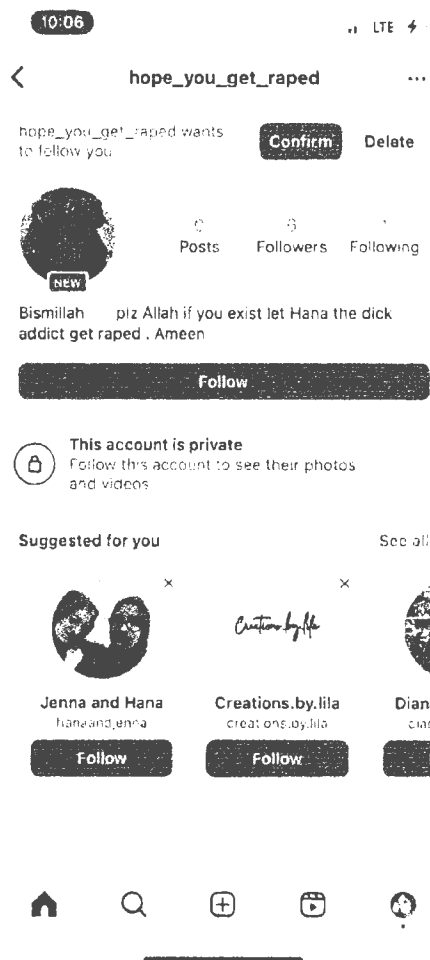


10. In 2023, a Snapchat profile with the username “maged awwad” requested to follow Hana’s profile.



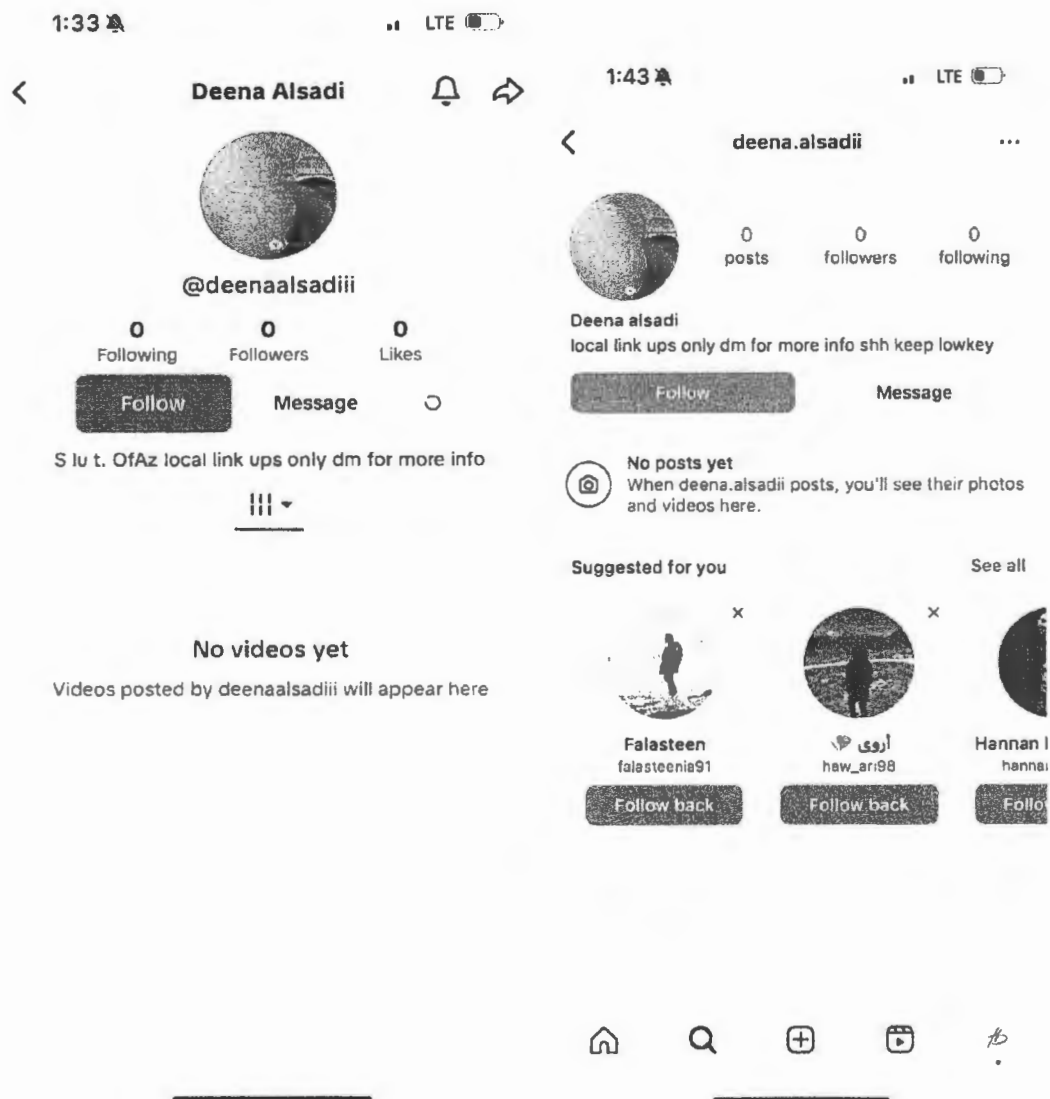
11. Multiple accounts were created using Hana's photograph and name without Hana's permission and contained obscene sexual statements:





12. Hana deleted all her social media accounts.

13. Deena began receiving harassing messages and multiple accounts were created using her name, but contained inappropriate profile photographs:



14. On January 31, 2024, Noor Alsadi, Deena and Hana’s brother, contacted his sister-in-law, who had family in Memphis, TN. The sister-in-law’s family obtained contacted

information for AWWAD's family. Noor contacted AWWAD's uncle on the phone. Noor asked AWWAD's uncle if he could ask AWWAD to leave Noor's sisters alone.

15. On April 2, 2024, Noor asked the uncle for AWWAD's father's phone number. Noor contacted the father via SMS message with no response.

16. On July 18, 2024, AWWAD purchased a 556 Anderson MFG AM-15 pistol serial number 15042981 from Bid Daddy's Pawn, Guns, Tools and Car Audio in Memphis, TN.

17. On August 13, 2024, Deena applied for an Order of Protection with the Chandler Municipal Court in Chandler, AZ. On that same date, the court entered an Injunction Against Harassment, ordering that "Defendant shall have no contact with Plaintiff except through attorneys, legal process, and/or court hearings." A copy of the petition and the court's order are attached hereto as Exhibit A. On August 27, 2024, AWWAD was served with the injunction at AWWAD's residence at 2890 Leesburg Dr. Germantown, Tennessee 38138.

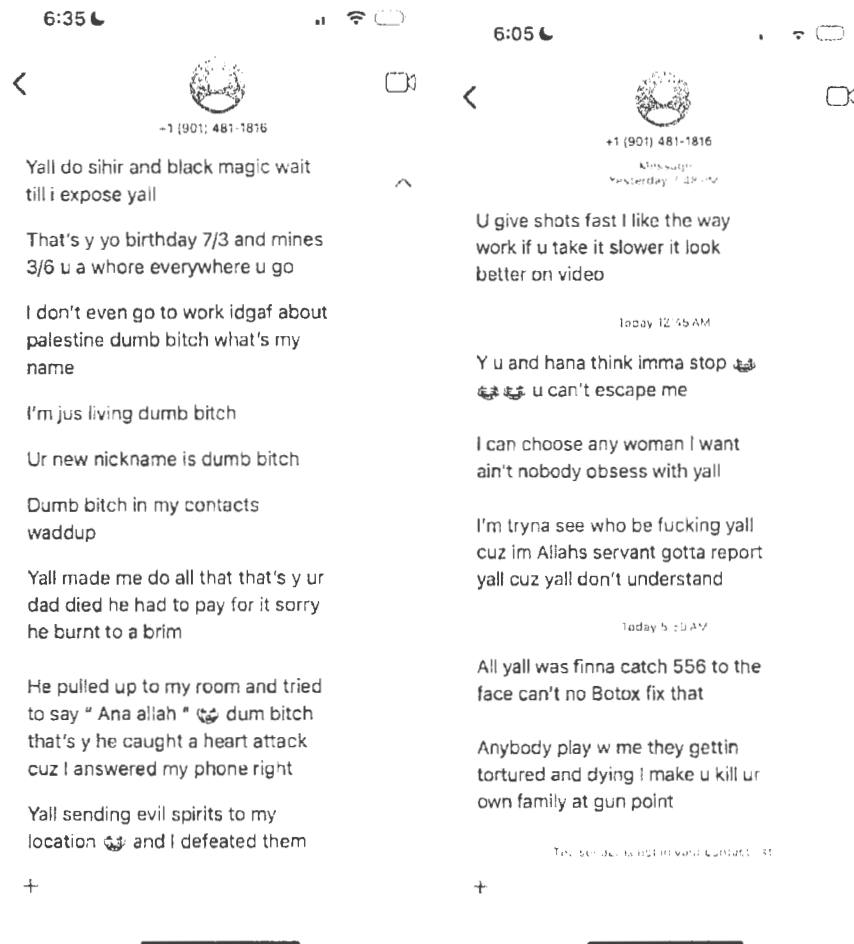
18. On September 6, 2024, AWWAD attempted to purchase a Heritage Arms 22LR Heritage Rough Rider revolver serial number 1BH411268 but was denied. The denial reason listed was "state prohibitor or court-ordered firearm restriction."

19. On September 15, 2024, Noor called AWWAD's father to confirm AWWAD was still at the Germantown address, because the Alsadi family was in fear for their safety. On the phone the father confirmed AWWAD was at the residence. Noor heard AWWAD's father yelling at a male Noor believed to be AWWAD. AWWAD's father asked the male why he was "doing this" and Noor heard the male say there was no way to prove it was him.

20. On September 16, 2024, Deena and Hana's mother, Sana Shalabi, contacted AWWAD's mother and asked her to have AWWAD leave Sana's daughters alone. AWWAD's mother advised AWWAD had done this before and there was nothing she could do.

21. The Alsadi's attorney, Alfredo Richard, reached out to the Germantown Police Department (GPD) in Germantown, Tennessee. Mr. Richard requested police to attempt to speak to AWWAD. On September 25, 2024, GPD attempted to contact AWWAD at 2890 Leesburg Dr. Germantown, Tennessee. GPD officers spoke to AWWAD's mother. AWWAD's mother advised GPD that she and her husband kicked AWWAD out because he had been causing so much trouble.

22. On October 11, 2024, Decna provided the FBI with the below messages that were sent from an unknown phone number to her phone:

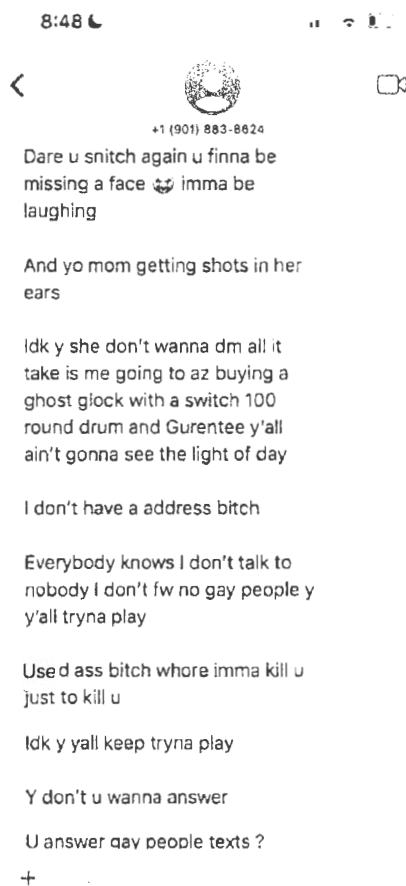


23. The operator of the unknown number advised their birthday was “3/6” and AWWAD’s birthday is March 6, 2001. The last two messages stated “*all yall was finna catch 556 to the face can’t no Botox fix that.*” And “*Anybody play w me they getting tortured and dying I make u kill ur own family at gun point.*” I believe that “556” is a reference to the 556 Anderson MFG AM-15 pistol AWWAD purchased on July 18, 2024.

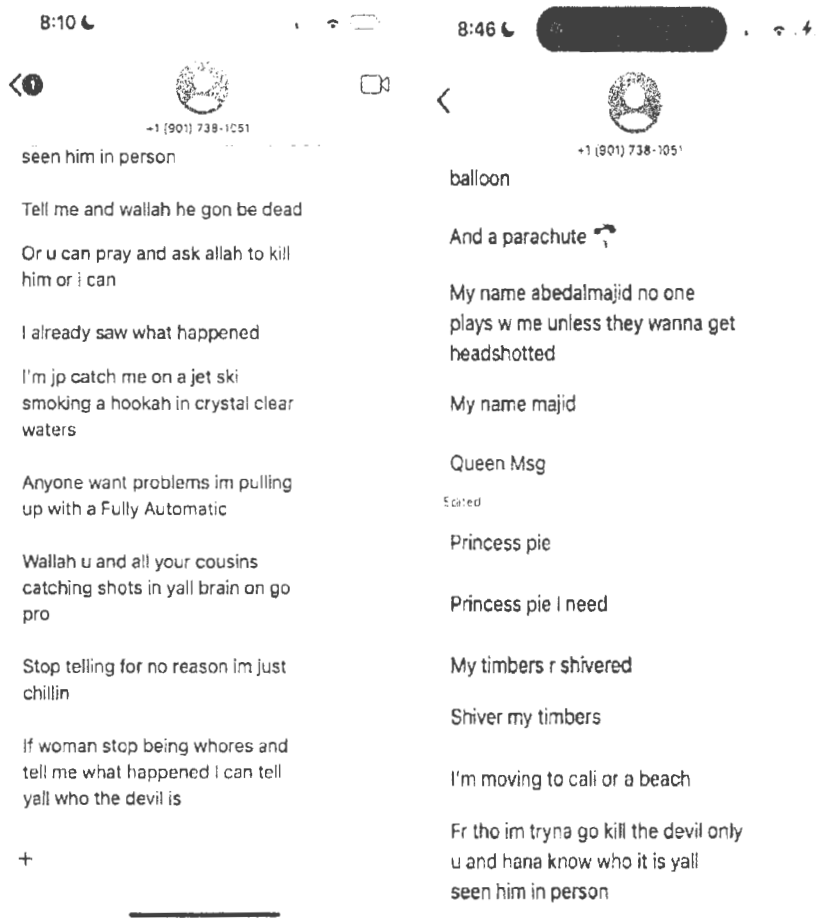
24. Due to the violent nature of the threats, an exigent request was sent to Verizon for location information related to the phone number 901-481-1816. Verizon responded that from 12:09PM central time to 5:24PM on Friday October 11, 2024, the Global Positioning

System (GPS) location consistently provided a latitude and longitude of 35.070306 -89.7941, with a radius of approximately 593 meters. The 2890 Leesburg Dr. Germantown, Tennessee was inside the provided radius.

25. On October 14, 2024, an unknown number sent the below messages to Deena's personal phone number:



26. On October 16, 2024, Deena advised a new unknown number sent her approximately 527 messages, to include the below messages:



27. One of the messages stated, "My name abedalmajid no one plays w me unless they wanna get headshotted". AWWAD's name is Abel-al Majid Awwad.

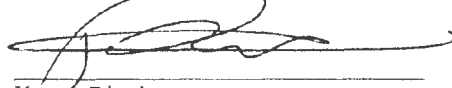
28. An exigent request was sent to Verizon for Global Positioning System (GPS) location consistently provided a latitude and longitude of 35.070306 -89.7941, with a radius of approximately 593 meters. The 2890 Leesburg Dr. Germantown, Tennessee was inside the provided radius.

29. The location data provided by Verizon in Paragraph 24 and Paragraph 28 indicates that he has returned to the 2890 Leesburg Drive address.

CONCLUSION

Based on my investigation, I believe that there is probable cause to believe that **ABED-AI MAJID AWWAD** committed the criminal violations as set forth in this criminal complaint and respectfully request that the Court issue an arrest warrant.

Respectfully Submitted,



Karen Rinehart
Special Agent
Federal Bureau of Investigation

Pursuant to Federal Rule of Criminal Procedure 41, the undersigned judicial officer has on this date considered information communicated by telephone, in reviewing and deciding whether to issue a search warrant. In doing so, this judicial officer has placed the affiant under oath and has confirmed by speaking personally with the affiant on the telephone that the signatures on the application and affidavit are those of the affiant, the documents received by the judicial officer are a correct and complete copy of the documents submitted by the affiant, and the information contained in the application and affidavit are true and correct to the best of the affiant's knowledge.

Subscribed and sworn to before me on the 17, day of October 2024.

s/ Tu M. Pham

HON. TU M. PHAM
CHIEF UNITED STATES MAGISTRATE JUDGE
WESTERN DISTRICT OF TENNESSEE