

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

SALEEM ALZAQ,
a/k/a "Saleem Abdallah Alzaq,"

Defendant.

SEALED INDICTMENT

26 Cr.

26 CRIM 425

COUNT ONE

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

The Grand Jury charges:

OVERVIEW

1. SALEEM ALZAQ, a/k/a "Saleem Abdallah Alzaq," the defendant, is a long-time member of Hamas, a designated Foreign Terrorist Organization ("FTO"), who has played multiple roles in helping Hamas pursue its terrorist aims.

2. Since at least in or about January 2020, SALEEM ALZAQ, a/k/a "Saleem Abdallah Alzaq," the defendant, and his co-conspirators have solicited and collected donations from individuals around the world, including from individuals in the United States, purportedly to provide humanitarian aid to people in Gaza. In total, since at least in or about January 2020, ALZAQ and his co-conspirators have collected the equivalent of at least \$1.7 million U.S. dollars through purported charitable campaigns, including from donors located in the United States. Though these campaigns were advertised publicly as fundraising for humanitarian aid, ALZAQ in fact used money from those campaigns to support Hamas.

BACKGROUND ON HAMAS

Hamas's Founding, Structure, and Objectives

3. “Harakat al-Muqawamah al-Islamiyya” is Arabic for “Islamic Resistance Movement” and is known by the acronym Hamas. Hamas, which is sometimes referred to by its followers as “The Movement,” is a terrorist organization based principally in the Gaza Strip and Palestinian West Bank territories.

4. Hamas was founded in 1987 by Sheikh Ahmed Yassin as an outgrowth of the Palestinian branch of the Muslim Brotherhood. The Muslim Brotherhood is an international Islamic organization founded in Egypt in 1928, and is committed to the globalization of Islam through social engineering and violent jihad. Hamas's founding occurred shortly after the December 1987 outbreak of violence in the first Palestinian intifada, or “uprising,” throughout Israel, the Gaza Strip, and the West Bank.

5. 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.

6. 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.”¹

7. 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.

8. 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. Hamas’s campaign of terrorism has killed and wounded citizens of Israel, the United States, and many other countries.

9. On October 7, 2023, Hamas committed its most violent, large-scale terrorist attack to date (the “October 7 Hamas Massacres”). In the early morning hours of October 7, 2023, Hamas sent more than 2,000 armed fighters into farms and towns in southern Israel, where they carried out the massacres of over a thousand people and the kidnappings of more than 200 others. Hamas terrorists attacked civilians, firing handguns, assault rifles, and handheld rocket launchers, in small residential communities, an Israeli town, and a music festival, among other places.

10. Hamas raises money to fund its terrorist activities through a variety of methods, including by soliciting and receiving cryptocurrency payments, advertising the ostensible anonymity of such transactions. Since 2019, Hamas’s military wing has used social media and other platforms to call for cryptocurrency contributions from supporters abroad, including in the United States, to Hamas-controlled virtual wallets, explicitly acknowledging that those payments

¹ Some of the information recounted herein is based on draft translations of statements in Arabic, which are subject to revision.

would be used to fund Hamas's campaign of violence. In addition, Hamas has long abused the trust of the international community and public support for legitimate humanitarian causes to fund their terrorist activities and commit acts of violence by raising funds through nonprofit organizations or charities. Hamas has entirely co-opted and run nonprofit organizations or charities while obscuring the links between these organizations and Hamas in order to evade sanctions. Moreover, Hamas has relied on purported "charitable" organizations and efforts, located around the world, to raise money, including through the "charitable" organizations' own social media accounts. Some of these "charitable" organizations are mere fronts for Hamas fundraising or serve a dual purpose in providing funding for Hamas and raising money for otherwise charitable pursuits. This allows Hamas to exploit the sympathy and generosity of the international public at the expense of the Palestinian people.

11. 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. 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.

The Designation of Hamas as a Terrorist Organization Since 1997

12. 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 authority under the Immigration and Nationality Act, and, to date, Hamas remains a designated FTO.

13. On October 31, 2001, the U.S. Secretary of State designated Hamas as a Specially Designated Global Terrorist ("SDGT") under Executive Order 13224.

THE DEFENDANT

14. SALEEM ALZQAQ, a/k/a "Saleem Abdallah Alzaq," the defendant, is a resident of Gaza. Since at least in or about 2017, ALZQAQ has been a member and battalion deputy in the Photography Department of the al-Qassam Brigades, Shujaiyya Brigade Media Office. Among other things, ALZQAQ, in his role as a Hamas media officer, has photographed Hamas events, including events with Hamas senior leaders such as Ismail Haniyeh ("Haniyeh") and Yahya Sinwar ("Sinwar"),² and distributed those photographs with descriptions of the events to other individuals involved in the Hamas media apparatus. In addition, ALZQAQ has posted Hamas propaganda on his accounts on multiple social media platforms, including posts glorifying deceased leaders of Hamas (such as Sheikh Ahmed Yassin, Haniyeh, and Sinwar), supporting al-Qassam Brigades fighters, and promoting and celebrating the October 7 Hamas Massacres.

² On September 8, 2015, the Department of State designated Sinwar as an SDGT pursuant to Executive Order 13224. Sinwar reportedly succeeded Haniyeh as head of Hamas after Haniyeh's death in July 2024. According to public reports, Sinwar himself was killed in an Israeli military operation in Gaza on October 16, 2024.

THE FUNDRAISING CAMPAIGNS

15. SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, has used social media and remittance platforms to post Hamas propaganda and raise funds for Hamas. ALZAQ has worked with others, including a co-conspirator not named as a defendant herein (“CC-1”) residing in France to raise funds for purported charitable causes in Gaza, such as performing animal sacrifices and providing food and winter necessities to people in Gaza. In total, ALZAQ and CC-1 raised at least approximately \$1.75 million. ALZAQ then provided funds raised through these purported charitable campaigns to Hamas.

16. In or about November 2021, SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, asked CC-1 to create a PayPal account so that ALZAQ could collect donations. ALZAQ explained, in substance and in part, that “we” were having issues with PayPal because of, among other things, the sanctions against people in Gaza and the fighting in Palestine and Gaza—referring to sanctions against Hamas, Hamas operatives, and Hamas fundraisers. During those conversations:

a. ALZAQ and CC-1 agreed that only CC-1 would access the PayPal account and would (i) periodically update ALZAQ on the status of the donations and (ii) accumulate donations and then send the funds via Western Union to ALZAQ.

b. At ALZAQ’s direction, CC-1 sometimes asked others to send their donations to ALZAQ on CC-1’s behalf. ALZAQ also sometimes provided CC-1 with different names to receive payments in Gaza. ALZAQ explained that it was better for CC-1 to use different names so that (i) the French government would not see CC-1 repeatedly sending money to Gaza and (ii) Western Union would not ban CC-1.

c. In or about December 2021, ALZAQ asked CC-1 to send ALZAQ the collected funds using Bitcoin or digital currency rather than Western Union. ALZAQ explained that, by using digital currency, no one would know how the money was sent, who sent the money, or where the money was sent. In or about May 2023, after the cryptocurrency exchange used by CC-1 questioned the source of the funds CC-1 had sent to ALZAQ, CC-1 began using a different cryptocurrency exchange to send money to ALZAQ.

17. On or about October 7, 2023—the day of the October 7 Hamas Massacres—SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, posted to his Snapchat account graphic images and videos from the October 7 Hamas Massacres as well as a video soliciting funds for a new campaign on the French crowdfunding website (the “Campaign”). The Campaign was purportedly to support Gazans that were injured on October 7, 2023. The Campaign was closed on or about October 12, 2023.

18. On or about October 9, 2023, SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, explained to CC-1, in substance and in part, that while he was using his Telegram channel to show the killing and attacks “against the Jews and the Zionists,” he was limiting the use of his Snapchat accounts to showcase the suffering of the Palestinians in Gaza so that his Snapchat accounts were not shut down for their content. ALZAQ also told CC-1 that some people wanted to donate but were concerned they would be associated with “terrorism.”

19. On or about October 13, 2023—less than one week after the October 7 Hamas Massacres and the day after the Campaign was closed—CC-1 registered an organization in France to solicit and collect donations for ostensibly charitable purposes (“Organization-1”). CC-1 established Organization-1 at the suggestion of SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, and for the purpose of collecting funds raised by and on behalf of ALZAQ.

Organization-1 purported to provide aid to “our brothers and sisters in Palestine and mainly in Gaza.”

20. Between at least in or about January 2020 and at least in or about December 2025, SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, and CC-1, raised approximately \$1.75 million through their purported charitable campaigns, including approximately \$626,000 from donors based in the United States.

ALZAQ PROVIDED FUNDS TO HAMAS

21. SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, had conversations with others about how the money that he and CC-1 raised through their purported charitable campaigns was being directed to Hamas. For example:

a. In or about November 2025, an undercover law enforcement officer posing as a New York-based Hamas supporter (the “UC”) contacted ALZAQ on Snapchat. During those conversations:

i. ALZAQ told the UC, among other things, that he (ALZAQ) had ways to receive money in New York and offered to connect the UC with friends that ALZAQ had in New York.

ii. In or about December 2025, ALZAQ informed the UC, among other things, that: (i) ALZAQ worked with a lot of people like the UC who wanted to get money to “the Green”—referring to Hamas;³ (ii) ALZAQ received money and gave it to “the Green” (*i.e.*, Hamas) without problems and was ready to do so with the UC; (iii) it would be difficult for ALZAQ to send the UC proof that he gave the money to Hamas; and (iv) ALZAQ was

³ “The Green” is a common nickname for Hamas as Hamas uses a green flag and members of the al-Qassam Brigades commonly wear green to signify their Hamas membership, including green headbands.

able to deliver money to “them” on a monthly basis by using coded language like “bread,” “bakeries,” “buy bread,” or “give it to the bakeries.” ALZAQ then advised the UC to “know that language” and to delete his messages. ALZAQ said he would do the same.

b. Approximately a year earlier, in or about January 2024, ALZAQ exchanged audio messages over Snapchat with a Hamas supporter residing in the United States (“CC-2”) using the same coded language ALZAQ later instructed the UC to use. For example:

i. On or about January 19, 2024, CC-2 messaged ALZAQ that he wanted to “buy a piece of bread” and “throw [it] at our cousins”—a reference to members of Hamas. ALZAQ responded that the situation is “very, very difficult” and “[d]ifferent from before,” but ALZAQ promised that “when things calm down, I’ll tell you, ‘yes, dear, we will deliver your bread to the—to the bread people.’ I understand, yes. I understand every word you say.”

ii. On or about January 28, 2024, ALZAQ messaged CC-2: “[P]art of, I don’t want to say all of it, part of amount that you sent me went to the bread people They are the ones present in North Gaza, we mean by North Gaza the ones present at . . . al-Shifaa Hospital⁴. . . . Some of them received the bread, thanks be to God.” CC-2 responded, in part: “You have no idea how happy I am . . . [R]emember when I told you I wish someone would deliver to them an amount they can buy with it . . . you understand me, what they can buy . . . this big piece . . . which . . . [chuckles] . . . Sheikh Yassin, may God rest his soul, you understand me now, right? I want to throw it on one of those You understand me. Can you do this?” CC-2’s reference to Sheikh Yassin meant Ahmed Yassin, one of the founders of Hamas. ALZAQ replied:

⁴ It has been widely reported that Hamas used Al-Shifa Hospital in Gaza City to host command operations, store weapons, and access tunnels for fighters and hostages.

“[S]imply put, I learned the way and can deliver to them whatever you want, meaning it’s very easy thing and I can deliver to them any amount you want.”

22. SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, also advised his donors to conceal that donations were intended for Hamas to avoid his accounts being shut down. For example, on or about October 15, 2024, ALZAQ instructed his followers on Snapchat not to write “free Palestine” or “long live Hamas” on their donations so that his PayPal accounts were not closed. The slogan “free Palestine” refers to Hamas’s explicit goal of destroying the State of Israel and establishing an Arab-Muslim nation state in its place under Sharia law.

STATUTORY ALLEGATIONS

23. From at least on or about January 1, 2020, up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” 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 Indictment.

24. It was a part and an object of the conspiracy that SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, and others known and unknown, would and did knowingly provide Hamas with material support and resources, including services, property, and

personnel, 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 Violate the International Emergency Economic Powers Act)

The Grand Jury further charges:

25. The allegations contained in paragraphs 1 through 22 of this Indictment are repeated and realleged as if fully set forth herein.

The International Emergency Economic Powers Act

26. The International Emergency Economic Powers Act (“IEEPA”), codified at Title 50, United States Code, Sections 1701 to 1707, confers upon the President authority to deal with unusual and extraordinary threats to the national security and foreign policy of the United States. Section 1705 provides, in part, that “[i]t shall be unlawful for a person to violate, attempt to violate, conspire to violate, or cause a violation of any license, order, regulation, or prohibition issued under this title.” 50 U.S.C. § 1705(a).

The Global Terrorism Sanctions Regulations

27. On September 23, 2001, the President issued Executive Order 13224, providing that all property and interests in property in the United States of persons determined to have committed or to pose a significant risk of committing acts of terrorism that threaten U.S. nationals or the national security, foreign policy, or economy of the United States, or determined

to act for or on behalf of such persons or to assist in, sponsor, or provide financial, material, or technological support for, or financial or other services to or in support of, such acts of terrorism or such persons (Specially Designated Global Terrorists or SDGTs) is blocked. Executive Order 13224 authorized the U.S. Secretary of the Treasury to promulgate rules and regulations necessary to carry out the Executive Order. Pursuant to this authority, the Secretary of the Treasury promulgated the Global Terrorism Sanctions Regulations (“GTSR”), implementing the sanctions imposed by the Executive Order.

28. Title 31, Code of Federal Regulations, Section 594.201(a) of the GTSR provides, in relevant part:

[P]roperty and interests in property of [SDGTs] that are in the United States, that hereafter come within the United States, or that hereafter come within the possession or control of U.S. persons, including their overseas branches, are blocked and may not be transferred, paid, exported, withdrawn or otherwise dealt in . . .

without a license from United States Department of the Treasury, Office of Foreign Assets Control (“OFAC”).

29. Section 594.204 of the GTSR further prohibits any U.S. person from engaging in any transaction or dealing in property or interests in property of persons whose property or interests in property are blocked pursuant to the GTSR. In particular, the GTSR specifically prohibits the making of any contribution or provision of funds to, by, or for the benefit of designated SDGTs.

30. Section 594.205 of the GTSR further prohibits attempts and conspiracies to violate or to evade the prohibitions of the GTSR.

31. As described above, on October 31, 2001, the Department of State designated Hamas as an SDGT pursuant to Executive Order 13224.

Statutory Allegations

32. From at least in or about January 2020 up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” 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 violate, and to cause a violation of, licenses, orders, regulations, and prohibitions issued under the IEEPA.

33. It was a part and an object of the conspiracy that SALEEM ALZAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, and others known and unknown, would and did knowingly and willfully violate, and caused the violation of, the IEEPA, and the licenses orders, regulations, and prohibitions promulgated thereunder, to wit, ALZAQ and his coconspirators caused U.S. persons to engage in transactions and dealings in property and interests in property of persons whose property and interests in property are blocked pursuant to the GTSR, including Hamas, without first obtaining the required approval of OFAC; and to evade the requirements of U.S. law with respect to transactions and dealings in property and interests in property of Hamas, in violation of Executive Order 13224 and Title 31, Code of Federal Regulations, Sections 594.201, 594.204, and 594.205.

(Title 50, United States Code, Section 1705; Executive Order 13224;
Title 31, Code of Federal Regulations, Sections 594.201, 594.204, and 594.205;
Title 18, United States Code, Section 3238.)

COUNT THREE
(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

34. The allegations contained in paragraphs 1 through 22 of this Indictment are repeated and realleged as if fully set forth herein.

35. From at least in or about January 2020 up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, and in an offense begun and committed elsewhere out of the jurisdiction of any particular State or district of the United States, SALEEM ALZQAQ, a/k/a “Saleem Abdallah Alzaq,” 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, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

36. It was a part and object of the conspiracy that SALEEM ALZQAQ, a/k/a “Saleem Abdallah Alzaq,” the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, monetary instruments and funds to places in the United States from and through places outside the United States, and to places outside the United States from and through places in the United States, in amounts exceeding \$10,000, with the intent to promote the carrying on of specified unlawful activity, to wit, the conspiracy to provide material support to Hamas and to violate IEEPA as charged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

(Title 18, United States Code, Sections 1956(h), 1956(f), and 3238)

COUNT FOUR
(Conspiracy to Defraud the United States)

The Grand Jury further charges:

37. The allegations contained in paragraphs 1 through 22 of this Indictment are repeated and realleged as if fully set forth herein.

38. From at least in or about January 2020 up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, and in an offense begun and committed elsewhere out of the jurisdiction of any particular State or district of the United States, SALEEM ALZAQ, a/k/a "Saleem Abdallah Alzaq," 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 defraud the United States and an agency thereof, to wit, to impair, impede, and obstruct the lawful and legitimate governmental functions and operations of the U.S. Department of the Treasury in the enforcement of national security sanctions and controls and regulations administered by the agency.

Overt Acts

39. In furtherance of the conspiracy and to effect the illegal object thereof, SALEEM ALZAQ, a/k/a "Saleem Abdallah Alzaq," the defendant, and his co-conspirators committed, among other things, over acts which are alleged in paragraphs 15 through 22 of this Indictment.

(Title 18, United States Code, Sections 371 and 3238)

FORFEITURE ALLEGATIONS

40. As a result of committing the terrorism offense alleged in Count One of this Indictment, SALEEM ALZAQ, a/k/a "Saleem Abdallah Alzaq," the defendant, shall forfeit to the

United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 981(a)(1)(G) and 2332b(g)(5), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense; any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offense; any and all assets, foreign and domestic, acquired or maintained by the defendant with the intent and for the purpose of supporting, planning, conducting or concealing said offense; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the total amount of proceeds traceable to the commission of the offense and/or the defendant's assets

41. As a result of committing the IEEPA offense alleged in Count Two of this Indictment, SALEEM ALZAQ, a/k/a "Saleem Abdallah Alzaq," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Codem Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense alleged in Count Two of this Indictment, including but not limiting to a sum of money representing the amount of process obtained as a result of the offense.

42. As a result of committing the money laundering offense alleged in Count Three of this Indictment, SALEEM ALZAQ, a/k/a "Saleem Abdallah Alzaq," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and 982(a)(1), and Title 28, United States Code, Section 2461(c), all property, real and personal, involved in the money laundering offense alleged in Count Three of this Indictment and all

property traceable to such property, including but not limited to, a sum of money representing the amount of property that was involved in the money laundering offense or is traceable to such property.

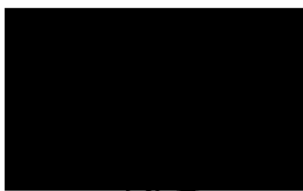
Substitute Assets Provision

43. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

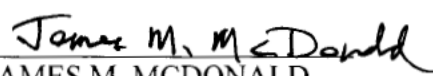
- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, and 2332b;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461)


Foreperson

9-14-26


JAMES M. MCDONALD
United States Attorney