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U.S. DISTRICT COURT
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CAROL L. MICHEL, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**SEALED
FELONY**

**INDICTMENT FOR PROVIDING MATERIAL SUPPORT TO
A FOREIGN TERRORIST ORGANIZATION, CONSPIRACY
TO PROVIDE MATERIAL SUPPORT TO A FOREIGN TERRORIST
ORGANIZATION, CONSPIRACY TO COMMIT WIRE FRAUD,
AND CONSPIRACY TO COMMIT MONEY LAUNDERING**

UNITED STATES OF AMERICA

v.

ABDEL ADHAMI
OMAR ADHAMI

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CRIMINAL NO.

SECTION:

VIOLATION:

26-211
SECT. PMAG.3
18 U.S.C. § 2339B
18 U.S.C. § 1343
18 U.S.C. § 1956(h)
18 U.S.C. § 1956(f)
18 U.S.C. § 2

The Grand Jury charges that:

COUNT 1
(Providing Material Support to a Foreign Terrorist Organization)

Beginning at a time unknown but not later than on or around March 2021, and continuing through on or about September 2026, within the Eastern District of Louisiana and elsewhere, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, did unlawfully and knowingly provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), namely currency, to a foreign terrorist organization, namely, Hamas, which the Secretary of State has designated as a foreign terrorist organization since on or about October 31, 2001, knowing that the organization was a designated foreign terrorist organization (as defined in

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Title 18, United States Code, Section 2339B(g)(6)), and knowing that the organization has engaged and was engaging in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B.

COUNT 2

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

Beginning at a time unknown but not later than on or around March 2021, and continuing through on or about September 2026, within the Eastern District of Louisiana and elsewhere, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, did unlawfully and knowingly conspire and agree with others known and unknown to the grand jury, to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), namely currency, to a foreign terrorist organization, namely, Hamas, which the Secretary of State has designated as a foreign terrorist organization since on or about October 31, 2001, knowing the organization was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), and knowing that the organization has engaged and was engaging in terrorist activity and terrorism; all in violation of Title 18, United States Code, Section 2339B.

A. AT ALL TIMES MATERIAL HEREIN:

On October 8, 1997, the United States Secretary of State designated Hamas as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act. On October 31, 2001, the Secretary of State also designated Hamas as a Specially Designated Global Terrorist under Executive Order 13224. The Secretary of State has also listed the following aliases for Hamas: Islamic Resistance Movement, Harakat al Muqawama al-Islamiya, Students of Ayyash, Students of the Engineer, Yahya Ayyash Units, Izz Al-Din Al-Qassim Brigades, Izz Al-Din Al-

Qassim Forces, Izz Al-Din Al Qassim Battalions, Izz al-Din Al Qassam Brigades, Izz al-Din Al Qassam Forces, and Izz al-Din Al Qassam Battalions. To date, Hamas remains a designated FTO.

B. THE CONSPIRACY

Beginning at a time unknown but not later than on or around February 2021, and continuing through on or about September 2026, in the Eastern District of Louisiana and elsewhere, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, did knowingly and intentionally combine, conspire, confederate, and agree together and with other persons, known and unknown to the Grand Jury, to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b)(1), —namely, currency, to Hamas, knowing that the organization was a designated foreign terrorist organization and that the organization engages in terrorist activity and terrorism.

C. MANNER AND MEANS OF THE CONSPIRACY

It was part and parcel of the conspiracy that **ABDEL ADHAMI** and **OMAR ADHAMI** and co-conspirators did:

November 2012

1. On November 20, 2012, **ABDEL ADHAMI** creates his Google account keetom.kanadi.91@gmail.com. Phone numbers +970599842122 [PS], +19417269750 [US], and +970597299421 [PS] were listed as the 2-Step verification phone numbers for the account.

November 2014

2. On November 1, 2012, **ABDEL ADHAMI** creates Instagram account @abedadhami with email address keetom.kanadi.91@gmail.com.

April 2016

3. On April 6, 2016, **ABDEL ADHAMI** created PayPal account xxxxxxxxxxxxxxxx3590.

November 2016

4. On November 28, 2016, **ABDEL ADHAMI** creates Snapchat account “aadhami56” with email address keetom.kanadi.91@gmail.com.

March 2021

5. On March 23 2021, Snapchat account “Saleem_alzaq” posted a photograph of Sheikh Ahmed Yassin, who was the founder and leader of Hamas.

May 2022

6. On May 28, 2022, Snapchat account “Saleem_alzaq” posted videos promoting HAMAS activities, including Hamas fighters carrying weapons and engaged in militant action.

December 2022

7. On December 15, 2022, **ABDEL ADHAMI** creates WhatsApp account +19417269750 and registers it with email address keetom.kanadi.91@gmail.com.

March 2023

8. NYPD Intelligence Bureau opened investigation on Gaza-based Saleem Alzaq for promoting fundraising campaigns purportedly for food/relief on social media, while also posting pro-Hamas images and videos on the same social media accounts. Alzaq was utilizing Snapchat account “saleem_alzaq” and had made social media posts between February 2021 and November 2023.

Snapchat postings to account “saleem_alzaq” provided Palestinian phone number +970595143793 and solicited donations via Western Union, Moneygram, Paypal, Visa, cryptocurrency (Bitcoin, Tether), as well as via foreign-based fundraising website Cotizup.com.

June 2023

9. On June 19, 2023, the first known Snapchat communication between **ABDEL ADHAMI**, utilizing account aadhami56”, and Alzaq, utilizing Snapchat account saleem_alzaq, occurred.

10. On June 22, 2023, **ABDEL ADHAMI** creates GoFundMe account 362764049 with keetom.kanadi.91@gmail.com. A compilation of all GoFundMe transactions for Adhami are outlined below.

July 2023

11. As of July 15, 2023, **ABDEL ADHAMI** is the subscriber to T-Mobile phone number 941-726-9750.

October 2023

12. On October 7, 2023, Hamas committed its most violent, large-scale terrorist attack to date (the “October 7 Hamas Attacks”). In the early morning hours of October 7, 2023, Hamas sent more than 2,000 armed fighters into farms, towns and a festival in southern Israel, where they killed over 1,000 people, committed sexual assaults, and kidnapped 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.

13. On October 8, 2023, Telegram account “gaza02023” was created.

14. On October 9, 2023, NYPD discovered Telegram user “gaza02023” made a post soliciting donations to PayPal account 1 associated with CC-1 which has the display name attributable to CC-1.

15. On October 10, 2023, **ABDEL ADHAMI** sent a video he recorded of himself to a WhatsApp group (19 total members) that included his brothers **OMAR ADHAMI** and M.A., and

his spouse I.S. The video depicts **ABDEL ADHAMI** driving down the interstate and shouting in Arabic while observing a paraglider flying by the interstate. An FBI linguist translated the statements made by **ABDEL ADHAMI** in the video which is outlined below:

“It is on fire; it is on fire! It is on fire, they arrived here, they arrived in America! O Good people, God is the greatest! O boy, they arrived in America! May God protect them! May God bring them victory!”

16. On October 12, 2023, NYPD observed Cotizup campaign ([https://www \[.\] cotizup \[.\] com/saleem-alzaq](https://www[.]cotizup[.]com/saleem-alzaq)) and ([https://www \[.\] cotizup \[.\] com/lesdemunisdegaza](https://www[.]cotizup[.]com/lesdemunisdegaza)) previously advertised by Alzaq on social media had both been taken down.

17. On October 13, 2023, the “A.B.” was founded.

18. Between October 12 and October 16, 2023, **ABDEL ADHAMI** posted images on Instagram account @abedadhami that depict individuals with weapons and green headbands that are commonly worn by members of Hamas or its affiliate, the ‘Izz al-Din al Qassam Brigades.

19. On October 14, 2023, “Saleem_alzaq” solicited donations via a cryptocurrency wallet associated with the cryptocurrency exchange Bybit (the “Alzaq Bybit Wallet”), which is a United Arab Emirates-based cryptocurrency exchange.

20. On October 16, 2023, **ABDEL ADHAMI** sends \$2000 via Western Union to Gaza-based Sondos Alzaq.

21. On October 18, 2023, **ABDEL ADHAMI**, via Snapchat account “aadhami56,” sent a voice message to Snapchat account “saleem_alzaq” stating the following:

Hello, first of all, thank God for your safety. I, I mean, I was worried about you because I tried to contact you yesterday all day long, but you did not respond and you did not post any stories. I know that the Internet there is light and it is hard to connect to the net. [Sighs] But, we really got worried about you and eh . . . what you call it? And thank God we heard your voice and we got reassured that you are fine. I want you to know that our hearts, minds and eh . . . everything we have are with you, but “God never burdens a sou--a soul beyond its capacity,” I wish we could come, I wish we could help you, I wish we could do Jihad with you, you are

the people of Jihad, you are the people of perseverance, you are who the Prophet, peace and prayer be upon him, has mentioned. Congratulations, congratulations, you are the free ones, not us eh . . . and let me know when you receive the wire transfer. If there is anything we can do, our lives and money and everything are at your service.

22. On or about October 22, 2023, **OMAR ADHAMI** and Saleem Alzaq engage in a conversation via Snapchat:

Saleem Alzaq: "Thank you, brother Abu Youssef. In euros or dollars, it doesn't matter."

OMAR ADHAMI: "May God grant you patience and protect you."

23. Snapchat account "Saleemalzaq2023" was created on or about October 30, 2023, and was removed several weeks following its creation.

November 2023

24. On or about November 3, 2023, **OMAR ADHAMI** sends the below message to Saleem Alzaq via Snapchat: "We were worried about you, Abu Abdullah"

25. On or about November 4, 2023, **ABDEL ADHAMI**, utilizing WhatsApp account 941-726-9750, sent an audio message to **OMAR ADHAMI**, who utilized WhatsApp account 504-616-1216, which stated the following:

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

26. On or about November 4, 2023, **ABDEL ADHAMI**, utilizing WhatsApp account 941-726-9750, sent an audio message recording from Saleem Alzaq to **OMAR ADHAMI** who utilized WhatsApp account 504-616-1216, which stated the following:

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

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

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

28. On or about November 4, 2023, **ABDEL ADHAMI** sent the two previously mentioned messages he shared with **OMAR ADHAMI**, to at least six other individuals via WhatsApp.

29. On or about November 4, 2023, **OMAR ADHAMI** and Saleem Alzaq engage in the below conversation via Snapchat:

OMAR ADHAMI: "Praise be to God, Lord of the Worlds. May God protect you and keep you safe from harm."

OMAR ADHAMI: "Omar Al-Adhami Abu Yusuf"

Saleem Alzaq: "Greetings"

Saleem Alzaq: "Brother Abu Youseff, in case I lose you in case they close the account, this is my WhatsApp, and I sent you a message"

OMAR ADHAMI: “May God protect you”

OMAR ADHAMI: “hopefully”

30. On or about November 4, 2023, **ABDEL ADHAMI** sent an audio message to Raed Yousef (a/k/a Abu Qasim) via WhatsApp, which stated the following:

“Peace be upon you, Abu-Qasim! How are you? I sent you a few days ago the link, I mean, for, for our brothers over there. Now, those guys, I mean, ... I don’t want to talk for too much. Just understand, and that’s it. I mean, the thing that you send or anybody else send gets to the, to the “true men” as well. Do you understand me? It does not only get to the babies [children], public people, or the needy ones, but it gets also to the other people—the “men”. Do you understand me? Anything you can do to help by either posting it or if you know someone to send it to. I, thanks to the Lord of the world, dedicate an amount daily.”

31. On or about November 4, 2023, **ABDEL ADHAMI** sent an audio message to Raed Yousef (a/k/a Abu Qasim) via WhatsApp, which stated the following:

“Praise be to God, Lord of the Worlds. I mean that I send them an amount of money on daily basis. . .Uh. . .Uh, at least we are feeding them. Do you understand me? They have meals cooked for them, and food reaches them and they eat, but you shouldn’t talk about anything. Here we tell them, we say bread. I mean, if you want anything, you talk and say this amount of money is for bread, and we will understand, because everything being talked about here, I mean uh...uh... they are listening to, heh.”

32. On or about November 4, 2023, **ABDEL ADHAMI**, utilizing WhatsApp account 941-726-9750, sent an audio message to his spouse, Iman Srour who utilized WhatsApp account 504-510-6452, which stated the following:

“Listen, I have sent you [Clearing his throat] ...I just heard that this guy [Agent note: understood to be a reference to Saleem Alzaq] whom I communicate with in Gaza. This guy [Ah]...I mean he delivers food and things like that not only to the poor, but you don’t talk about this with anyone, try to understand what I mean by yourself. He also delivers food to the men, do you understand? So, try to bolster his account. I mean disseminate his account. And if you know other people [Ah, ah] ask them to disseminate his account as well.”

33. On or about November 4, 2023, Snapchat account “saleemalzaq2023” sent a voice message to **ABDEL ADHAMI** stating the following:

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

34. On or about November 4, 2023, Snapchat account “saleemalzaq2023” sent a voice message to **ABDEL ADHAMI** stating the following:

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

35. On November 4, 2023, **ABDEL ADHAMI** sends his first donation via PayPal account xxxxxxxxxxxxxxxx3590 to CC-1 in the amount of \$477.

36. On or about November 7, 2023, “Saleemalzaq2023” posted a message in Arabic which translates to “Major General Fayez Al-Duwairi [a retired military general of the Jordanian Armed Forces]: After 30 days of violent bombardment and 11 days of ground invasion, the Israeli Army tanks are still standing still and have only advanced a few meters, and the army has not yet achieved any real breakthrough into the Palestinian defenses or any military achievement on the ground! What the Palestinian fighter is doing is something extraordinary that we have never seen before.”

37. Examples of pro-HAMAS propaganda postings appearing on the linked “gaza02023 Telegram Account” include the following postings from in or about November 2023.....

38. In or about November 2023, the “Saleem_alzaq003” Snapchat account posted requests for donations for “the people of Gaza” through PayPal account 2 of his financial associate, CC-1, and further advertised the so-called A.B.

December 2023

39. On or about December 7, 2023, **ABDEL ADHAMI**, via “aadhami56”, sent a voice message to Snapchat account “saleem_alzaq003” stating the following:

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

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

41. On or about December 24, 2023, “Saleem_alzaq003” Snapchat account posted a link to the “gaza02023” Telegram Account.

42. On or about December 29, 2023, Snapchat account “saleem_alzaq003” sent a voice message to **ABDEL ADHAMI** stating the following:

No worries, my dear, and I will explain to you right now why. First of all, prayer be to God’s Prophet. The PayPal is [another nationality], it has nothing to do with Gaza. That is number one. If it was related to Gaza, the account would have been closed on day one. That is the first thing I want you to know. This is [another nationality], from the state of [another country]. It belongs to people, young men, friends located in France. They are my friends. When you first transfer through this PayPal, you transfer to [another country]. My friend over there, through the PayPal—he has an association—of course a benevolent association—not his—his and mine together. We established it at the beginning of the war, B.B. association. Through the association—there is also a second PayPal for the association. Meaning there are two PayPals, we aggregate what’s in PayPal in his bank account, in his bank account, at the bank in [another country]. How do I receive here from his bank account in [another country]? Through cryptocurrency. There are digital platforms over there, Bitcoin, USDT, Ethereum and such things, I mean the cryptocurrency. My friend buys the cryptocurrency, which is the USDT and he transfers them to me USDT, which means Dollars, he transfers them to Dollars. There 28 are exchange agents here that transact, but of course all the codes, numbers, and things are encrypted. Nobody in the world could know where the

money went. Through this encrypted code, I go to the exchange agent, exchange agent, meaning not banks, exchange agents, people, even young men with money, exchange agent. I give him the code and he gives me—of course he takes his commission: one percent, two percent of the amount of money and I receive the amount of money. That is all the matter. If anybody wants to inquire, tell them not to worry, your money will go to [another country] and from [another country] they buy cryptocurrency and the cryptocurrency comes to Gaza. It is a secret I just told you about.

January 2024

43. **ABDEL ADHAMI**'s first known contact with Saleem Alzaq via WhatsApp occurs.

44. **ABDEL ADHAMI**'s first known contact with CC-1 via WhatsApp occurs.

45. On or about January 9, 2024, **ABDEL ADHAMI** then sent N.N. several videos posted on one of Saleem Alzaq's Snapchat accounts via WhatsApp. N.N. then stated she wants to help with what Adhami is doing, and asked for details about how to send money to the association.

ABDEL ADHAMI replied with two voice messages that stated:

“By God, look [N.N.], you like to help, and I remember the days when there was an earthquake in Syria, and you came to the store and took the stuff I was able to help with. It is clear that you like to do good deeds and that is why I am talking to you, God bless you. This life, “And the life of this world is nothing but the enjoyment of delusion.” And congratulations to those who tip the scales of good deeds over bad deeds on doomsday. I also want to tell you something. What we do eh, I do not want to talk too much, I mean. I hope you can read between the lines. The things that we provide do not reach the displaced people only. On the contrary, they also reach the men. I hope you understand what I mean. I mean, the young guys that we communicate with over there, I mean those over there, distribute anything we do, a big part goes to the people, and a big part goes to the other people, to the men. Do you understand what I mean? So, this is our role.”

“When it comes to what we are doing, if you want to talk about it with someone, I prefer that you talk about it face to face eh...we do not want to mess up the situation. Do you understand what I mean? I cannot tell you everything on the phone, but I prefer that you talk about whatever you want face to face.”

46. On or about January 19, 2024, **ABDEL ADHAMI**, via “aadhami56”, sent a voice message to Snapchat account “saleem_alzaq003” stating the following:

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

47. On or about January 19, 2024, Snapchat account "saleem_alzaq003" sent a voice message to **ABDEL ADHAMI** stating the following:

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

48. On or about January 28, 2024, Snapchat account "saleem_alzaq003" sent a voice message to **ABDEL ADHAMI** stating the following:

And, dear one, I want to tell you something. Part of, I don't want to say all of it, part of amount that you sent me arrived to the bread people. This is with God's grace. After being disconnect we were able to be in touch with them. The bread people, you understand me. Thanks be to God. Thanks be to God. Thanks be to God. Their situation was difficult. They pray for the person who donated this bread, they pray for everything good and they say 'May God grace him from His greatest graces.' This is the message I wanted to deliver to the person who donated the bread. This is the thing I wanted you to know. They are the ones present in North Gaza. North Gaza we mean they are present at al-Shifaa Hospital in al-Shujaia neighborhood, al-Sheikh Radhwan, the north, Beit Hanoon, Beit Lahia, these areas. Some of them received the bread, thanks be to God.

49. On or about January 28, 2024, **ABDEL ADHAMI** initiates a WhatsApp conversation with Florida-based Raed Yousef in which contains the following points of interest:

ABDEL ADHAMI talks with someone by the name of Abu Al-Qassim [Raed Yousef] and starts his message by saying that the recording is not for him, as he has no hidden agenda. **ABDEL ADHAMI** tells Abu Al-Qassim not to ask him any questions, as **ABDEL ADHAMI** cannot provide him with answers on the phone.

“If you were in front of me, I would be able to tell you everything in details, and show you things, and documents that would make you turn into a believer,” **ABDEL ADHAMI** states. **ABDEL ADHAMI** tells Abu Al-Qassim that the brothers’ situation is very bad and says that specifically the brothers who deals or handles the bread, and they need any help. **ABDEL ADHAMI** tells Abu Al-Qassim that he (**ABDEL ADHAMI**) doesn’t get fooled easily, and he knows what he is talking about, and understands why the people are not able to comprehend what they see and read. At the end **ABDEL ADHAMI** says that he knows of a second entity that no one else knows and will be able to give them whatever Abu Al-Qassim is willing to give.

A written message by **ABDEL ADHAMI** that reads; ‘This is today’s conversation.’ The attachment is an audio where the speaker (S.G.) tells (‘Abd Al-Adhami) that he delivers part of his donation to the “bread people”, as they are suffering. They are in a bad place and need the donation. The speaker says that those people approached him, and he did not approach them, because they know him very well through his charity work.

An audio message by **ABDEL ADHAMI** tells Raed (Abu Al-Qassim) that he spoke with CC-1 yesterday and that CC-1 already knows about him. **ABDEL ADHAMI** also says that he has mentioned to CC-1 that he is going to help as much as possible, and he has already started by placing leaflets in the mosque. **ABDEL ADHAMI** says that tomorrow, he will go to New Orleans and visit several mosques, and speak with the Imams there, and gets their permission to leave some leaflets there as well. At the end of the message **ABDEL ADHAMI** tells Raed that the PayPal account is the one he has already sent to him, and he is going to forward him a video that shows how **ABDEL ADHAMI** sends money via PayPal.

February 2024

50. On or about February 1, 2024, **ABDEL ADHAMI**, via “aadhami56”, sent a voice message to Snapchat account “saleem_alzaq003” stating the following:

May God be pleased with you, my brother, and may God make you victorious. By God whatever one does he remains falling short toward you. I swear by God. I am in a state of rage, in an upset state, and in a state of extreme sadness because I can’t be there with you in person. I honestly . . . don’t want . . . I want to be there by myself. By God, every time I see one of the bread people do something . . . Or . . . I would wish I was there with him. I wish I was there with them on the same line. And when I hear that one of them was chosen by God and requested the deed (martyrdom), I would wish . . . I would pray, and pray to God say ‘Oh, God, unite me with him near the pool (of paradise) with our Lord, Muhammad, May peace Be Upon Him. My wish is to be there. I don’t want to be here. By God, if they open this crossing, by God I will be the first one. But what can I do. I ask God almighty that I be one of those who make Jihad with their money. (Sigh) By God, I swear by God who is no

God but He . . . By God who permitted swear by his name only, I was praying a little ago the afternoon prayer, and I did the supplication worship prayer (Qunut) and I prayed for the entire nation and for the Mujahideen, and for all the people and I prayed God that I join them. No matter what I do I fall short. I know myself, I'm falling short.

51. On or about February 3, 2024, **ABDEL ADHAMI**, via "aadhami56", sent a voice message to Snapchat account "saleem_alzaq003" stating the following:

But I would like to try that--that people do not give me cash. Why? Because when they give me cash, let's say 1,000.00 Dollars a month, people, all the people give me 1,000.00 Dollars. I have to deposit this 1,000.00 Dollars into my account. Honestly, I am a 30 businessman, I have stores, and I try to stay away from the cash. We have an issue over here with cash. I want them to deposit the amount of money directly into my account or transfer it directly to the association in a way that I am not involved, I stay away from this matter. I do not want them to keep giving me cash, because I have to tax on the cash as well, and if the cash becomes a lot, the government might come and ask me: 'Come, you keep depositing a lot of money cash into your account. Where is this amount of money from? You tell me that your store-you claim in your tax that you have made 10,000.00 Dollars cash this month, but you deposited 12,000.00 Dollars cash. Where did the 2,000.00 come from?' You know what I mean? They do not check on such small amounts of money, but when the amount of money is very big. It will be good, God willing.

52. On or about February 3, 2024, Snapchat account "saleem_alzaq003" sent a voice message to **ABDEL ADHAMI** stating the following:

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

53. On or about February 14, 2024, **ABDEL ADHAMI**, via "aadhami56", sent a voice message to Snapchat account "saleem_alzaq003" stating the following:

I am following your Snaps step by step everyday when I wake up, I open [your page] and I watch everything, and Praise be to God and praise be to God, may God provide and bless. But I want to ask you, the bread people, do they need anything? Are they short on anything? Everything is well, God willing? They, my dear, we must take care of them, we must kiss their boots. May God protect them and make them victorious.

54. On or about February 29, 2024, **ABDEL ADHAMI**, **OMAR ADHAMI**, and M. A., engage in a group chat (Group name: 4 HER BEAUTY) via WhatsApp:

ABDEL ADHAMI: "I'm going to send \$1000 to Gaza"

OMAR ADHAMI: "Don't forget to keep \$1000..."

OMAR ADHAMI: "...for the bread"

OMAR ADHAMI: "Oh!"

M. A.: "Okay"

ABDEL ADHAMI: "Allah willing, we need to repeat this every months so Allah will reward us."

ABDEL ADHAMI: "I just transferred 1000"

June 2024

55. Israel's National Bureau for Counter Terror Financing (NBCTF) shared information with FBI that Saleem ALZaq is a confirmed member and battalion deputy in the Hamas Al-Qassam Brigade, Shujaiyya Brigade Media Office.

August 2024

56. On or about August 23, 2024, **ABDEL ADHAMI**, via "aadhami56", sent a voice message to Snapchat account "saleemalzaq12" stating the following:

[sharp noise] Hello Abu 'Abdallah. Listen! I have a request to ask you. I rely on God and on you that you try to fulfil it. Do not tell me that you cannot. Try, for God's sake, try and then if you tell me that you couldn't eh, that you couldn't do it then that's it I will accept it. The request is that you go to the bread people and you tell them there is a human being that was supporting us from the beginning of the war and you tell them the story, one, two, three. All that this guy wants from you is

a loaf of bread that you throw to the other people in his name. That is it, I swear by God that I will not ask for more than that. My name written on it and you throw it. And whatever you want, God bless you, I know that you, that they are selling it for the sake of God, glory be to him, but I still think that you, God bless you...my dream, my dream...I want it.

57. On or about August 23, 2024, **ABDEL ADHAMI**, via “aadhami56”, sent a voice message to Snapchat account “saleemalzaq12” stating the following:

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

September 2024

58. On or about September 3, 2024, **ABDEL ADHAMI**, via “aadhami56”, sent a voice message to Snapchat account “saleemalzaq12” stating the following:

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

59. On September 27, 2024, a New York Police Department (NYPD) undercover employee (UCE) initiated contact with Saleem Alzaq via Facebook and Alzaq asked to communicate via WhatsApp.

October 2024

60. On October 21, 2024, **ABDEL ADHAMI** sends \$234.88 to CC-1 via GoFundMe.

November 2024

61. On November 25, 2024, **ABDEL ADHAMI** sends \$1056.97 to CC-1 via GoFundMe.

December 2024

62. On December 4, 2024, **ABDEL ADHAMI** sends \$1056.97 to CC-1 via GoFundMe.

63. On December 7, 2024, **ABDEL ADHAMI** sends \$234.88 to CC-1 via GoFundMe.

64. On December 12, 2024, **ABDEL ADHAMI** sends \$1056.97 to CC-1 via GoFundMe.

January 2025

65. On January 2, 2025, **ABDEL ADHAMI** sends \$1080.46 to CC-1 via GofundMe.

66. On January 12, 2025, **ABDEL ADHAMI** utilizes PayPal2 account to send his first donation to Organization 1, associated with CC-1 in the amount of \$500.

February 2025

67. On February 1, 2025, **ABDEL ADHAMI** sent an email in Arabic to qassamiah7alat@gmail.com. Per translation, the subject of the email was titled “May the peace and mercy of God be upon you” and the body of the email stated the below:

“Please allow me to help you with whatever assistance I can, thanks to God Almighty. However, I have a few questions first: 1. Who will benefit from this assistance, and who exactly will receive it? 2. Are you affiliated with the Qassam Brigades, or are you just a fan and supporter of their movement on social media?”

68. On February 1, 2025, the user of email address qassamiah7alat@gmail.com responded in Arabic. Per Google Translate, the user responded “May the peace, mercy, and

blessings of God be upon you. Welcome. The support will go to the channel and its supplies to maintain its continuous work without interruption.”

March 2025

69. On March 5, 2025, NYPD UCE asked for Alzaq’s assistance in sending donations as UCE had never done it before. Alzaq stated he will send UCE’s number to his friend in Louisiana.

70. On March 5, 2025, **ABDEL ADHAMI** contacts UCE via WhatsApp from phone number 941-726-9750. Adhami and UCE engage in a recorded WhatsApp phone conversation outlined below:

ABDEL ADHAMI stated that he knows Alzaq since the war started. **ABDEL ADHAMI** then explained to the OP that s/he has different ways to send money on his/her own: PayPal or GoFundMe. **ABDEL ADHAMI** stated that they used to use MoneyGram and Western Union before the war but stopped. **ABDEL ADHAMI** then stated that the OP can send the money to him via Zelle and he will in turn, send it over. OP 551 stated that s/he was looking for people in New York near him/her so s/he doesn’t have to do this alone. **ABDEL ADHAMI** stated that he has no contact and knows no one in New York. **ABDEL ADHAMI** proceeded to ask the UCE what his/her issue is. Is it a technical issue, or a trust issue? UCE stated it is a trust issue. **ABDEL ADHAMI** stated that he understands because there are a lot of scammers. **ABDEL ADHAMI** then started to convince the UCE to start off by sending a small amount, even \$20, and it will all be very well documented. **ABDEL ADHAMI** stated that when people send a donation of \$20, Alzaq then goes to buy either a jacket/blanket or food/water for those in Gaza. He then takes pictures and will send them to the UCE. **ABDEL ADHAMI** stated that there are other workings in Gaza besides aid that he is unable to discuss on the phone and asked the UCE if s/he understands what he is alluding to. **ABDEL ADHAMI** stated that there are things done above and below ground. **ABDEL ADHAMI** ended the conversation stating that the UCE should consider him (**ABDEL ADHAMI**) his/her brother.

April 2025

71. In April 2025, Israel’s NBCTF shared further information that Saleem Alzaq is a member of Hamas's Khalid Bin al-Walid Brigade, Ammar bin Yasir Platoon.

June 2025

72. On June 17, 2025, **ABDEL ADHAMI** told NYPD UCE to send money directly to Saleem Alzaq:

Honestly it's just because I transferred a lot of money to him and other people. i am a Palestinian I feel like it's my duty to help my people. My friends give me money and I transfer. I can't really talk too much. I'm trying to protect myself, you and everybody. I pay taxes too. I'm a business owner. I prefer you transfer the money directly to him. If you feel comfortable giving me the money and I transfer the money that's fine too. But Allah also said if you do a deed don't let your left hand know what your right hand is doing.

August 2025

73. On August 16, 2025, **ABDEL ADHAMI** travels from the US to Tel Aviv, Israel via Dubai. **ABDEL ADHAMI** travels with his wife and two children. **ABDEL ADHAMI** stated he is traveling to Ramallah City in the West Bank. **ABDEL ADHAMI** claimed his purpose of travel was to build a house in a village called Surda.

September 2025

74. On September 10, 2025, **ABDEL ADHAMI** arrives back in the US in Houston, Texas. CBP conducted a secondary inspection of **ABDEL ADHAMI** and seized his mobile device for exploitation.

November 2025

75. On or about November 11, 2025, **ABDEL ADHAMI** has a WhatsApp conversation with A.S. that is summarized below:

ABDEL ADHAMI says that he used to ask everybody to help, especially about nine months after the issue started because "the young guys, who are under, got squeezed, they needed help and requested a lot of help, I mean money, so that they keep getting by. As you noticed when the issue started, their response was very strong and positive, but as time went by, it started decreasing, right? I don't know if you have paid attention or noticed this matter. Their resources dwindled significantly and they needed support, so I went and contacted a lot of people at our mosque...and told them the young guys are in need...and I am dealing with a few

things, I will tell you *face to face*, God willing, when I tell you *face to face*, you will be surprised of the things I am going to tell you about and that I know.” **ABDEL ADHAMI** says that he talked to D.T., the Shaykh, Ahmad, M.Z., and everybody, but only three stood by his side including D.T. who helped with about \$300 about twice or three times. **ABDEL ADHAMI** says that everybody else was afraid and told him stay away from them because they do not want to get in trouble.

76. On or about November 26, 2025, an NYPD UCE was contacted via Snapchat by Saleem Alzaq, who utilized Snapchat account “@Saleemalzaq2425”. Alzaq requested the UCE send donations to the children of Gaza via PayPal to the link “https://PayPal.me/Organization 1”.

December 2025

77. On or about December 3, 2025, the UCE and Alzaq engaged in the following conversation via Snapchat:

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

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

UCE: [text] I’m in New York. PayPal blocked me.

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

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

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

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

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

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

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

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

78. On or about December 3, 2025, the UCE and Alzaq engaged in the following conversation via Snapchat:

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

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

Alzaq: [text] 941-726-9750

Alzaq: [audio] Peace be upon you my brother, and God may bless you my brother, and God may send you 1000 blessings, my brother Hussain. This is my friend's

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

Alzaq: [text] Abed Al-Adhami

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

79. On or about December 4, 2025, and December 5, 2025, the NYPD UCE and

ABDEL ADHAMI engaged in the following conversation via WhatsApp:

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

Adhami: [text] Peace be upon you

Adhami: [text] God bless you

Adhami: [text] Where do you live

UCE: [text] In New York

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

Adhami: [text] Ok can you Zelle

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

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

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

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

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

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

Adhami: [audio] May the peace and mercy of God be upon you. The first thing you should know is that this group is recognized in the United States and everything is a hundred percent legal. Me personally, I give God the one. If you want, I can send you a statement. Me personally, every month, I transfer \$3500-\$4000, even before the war I transfer, and thank God nothing has happened. You are going to transfer to a charitable organization, and the money goes to France, and from France, Abu Abdullah has access to the account, and he uses them in Gaza. The card thing he told you about is if you want, I can, you can put the money in your bank account, and after, you call me and you give me the card number as if you were a customer going into my store. I charge you the amount you want, you give me the card details, and I put them into the cash register that I have in the store and the money goes into my bank account. I take them [the money] and transfer them to Abu Abdullah and I sent you an invoice and a receipt. I send you videos where the money went and who received them, and everything is a hundred percent.

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

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

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

80. On or about December 5, 2025, Alzaq sent the below message to the NYPD UCE

via Snapchat:

Alzaq: [audio] I called my friend and he told me what happened [inaudible] Zelle, but if it doesn't work, it's okay. Do it in the way of a credit card. Give him the card

as if you were buying from him, but contact him, but God bless you, contact him, and get it done. Get the money taken out of the card as he said, and that's it. If Zelle is not working, that's it, as if you were buying something from his store. I think he talked to you and he talked to your brother, meaning it's easy, as you were with the same way as discussed. God willing it will work. You guys are on the top of my head. It's important you talk to him.

81. On or about December 22, 2025, NYPD UCE engages with Gaza-based Hamas financier Saleem Alzaq. Alzaq states money which he receives "gets to me and gets to the Green" [Hamas]. ALZAQ states he delivers funds monthly to "them." Alzaq states that the "secret way" is to use coded language to refer to the "Green" as "bread" or "bakeries." Alzaq instructs the UCE to "forget about it and use the words I gave you and that's it" and not use the word "Green." Alzaq asks UCE to delete all messages.

January 2026

82. On or about January 14 through January 16, 2026, **ABDEL ADHAMI** engages in conversation with an NYPD UCE:

83. UCE engages with Louisiana-based **ABDEL ADHAMI** on WhatsApp after being directed to reach out by Gaza-based Hamas financier Alzaq. ADHAMI explains that he funds the "bread people" and explicitly differentiates between funds he sends for the "orphans" and funds he sends to the "bread people."

84. **ABDEL ADHAMI** states "he who equips a fighter, is as if he fought" and states he is performing "Jihad by money."

85. **ABDEL ADHAMI** states it's easy to fund the bread people since they look "normal" and describes how "the bakeries took our cousins" [Jews] and were able to "take them out around and let them breathe air" [likely a reference to Hamas moving hostages]. He then states that the bread people "go a lot to meet Abu Abdallah [Alzaq], and Abu Abdallah gives them the flour, you understand, so they can bake bread with it. I know a lot of the work, and I know

what they need, and I know how everything is, how they turn the flour to bread, and what kind of flour they want."

86. **ABDEL ADHAMI** also offers to send a friend/courier "who knows everything" in New York, identified as R.A., to pick up cash from UCE.

87. **ABDEL ADHAMI** also discusses flammable materials on sale at Home Depot within the context of throwing "pens" [likely reference to rockets] going further distances in Gaza.

May 2026

88. On or about May 3, 2026, **ABDEL ADHAMI** sends a voice message via WhatsApp to **OMAR ADHAMI** and M.A.:

"Hello guys! How are you? I want to tell you something, but I don't want anyone to ask any questions after that. Eh--, just be careful. A lot of things had happened to me and interrogations [lasted] for three hours, I was about to...I mean anyway, the important thing that the man with whom we used to offer our sacrifices is exposed, OK? And everything happening is known, everything, every transfer, everything. Guys, please be careful and when I see you, I will tell you everything that happened to me. I mean they confiscated my money, I mean I only had \$5000. I took \$6000 from the store, right? We spent 1000, and I had 5000 left with me, it was taken, guys."

All in violation of Title 18, United States Code, Section 2339B.

COUNT 3
(Conspiracy to Commit Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

1. The allegations contained in Count 1 of this Indictment are repeated and realleged as if fully set forth herein.

2. **ABDEL ADHAMI** is a resident of Covington, Louisiana, and **OMAR ADHAMI** is a resident of Slidell, Louisiana, all within the Eastern District of Louisiana.

3. **ABDEL ADHAMI** and **OMAR ADHAMI** both work together and are members of J.L. O Beauty Supply, LLC, located in Slidell, Louisiana.

B. THE SCHEME AND ARTIFICE TO DEFRAUD:

Beginning at a time unknown but not later than on or around February 2021, and continuing through on or about September 2026, in the Eastern District of Louisiana and elsewhere, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, and others known and unknown, did knowingly and willfully conspire and agree to commit wire fraud by collecting and transferring currency via wire transfers to Hamas through its intermediaries, in violation of Title 18, United States Code, Section 1343.

C. MANNER AND MEANS:

It was part of the scheme and artifice to defraud that **ABDEL ADHAMI** and **OMAR ADHAMI** and others known and unknown knowingly and willfully devised and intended to devise a scheme and artifice to fraudulently transmit and cause to be transmitted currency to Hamas, knowing that the organization was a designated foreign terrorist organization and that the organization engages in terrorist activity and terrorism.

It was further part of the scheme and artifice to defraud that:

D. THE OFFENSE:

Beginning at a time unknown but not later than on or around February 2021, and continuing through on or about September 2026, in the Eastern District of Louisiana and elsewhere, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, and others known and unknown, for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth above, did transmit and cause to be transmitted, by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, to wit:

Date	Sender	Recipient	Method	Amount
10/16/2023	Abdel Adhami	Sondos Abdalkareem Alzaq	Western Union	2,000.00
11/04/2023	Abdel Adhami	CC-1	PayPal	477.00
11/08/2023	Abdel Adhami	CC-1	PayPal	47.85
11/11/2023	Abdel Adhami	CC-1	PayPal	100.00
11/15/2023	Abdel Adhami	CC-1	PayPal	47.56
11/17/2023	Abdel Adhami	CC-1	PayPal	50.00
11/21/2023	Abdel Adhami	CC-1	PayPal	100.00
11/27/2023	Abdel Adhami	CC-1	PayPal	100.00
12/07/2023	Abdel Adhami	CC-1	PayPal	200.00
12/10/2023	Abdel Adhami	CC-1	PayPal	100.00
12/16/2023	Abdel Adhami	CC-1	PayPal	100.00
12/19/2023	Abdel Adhami	CC-1	PayPal	500.00
01/02/2024	Abdel Adhami	CC-1	PayPal	1,000.00
01/20/2024	Abdel Adhami	CC-1	PayPal	1,000.00
01/28/2024	Abdel Adhami	CC-1	PayPal	1,000.00
02/01/2024	Abdel Adhami	CC-1	PayPal	300.00
02/04/2024	Abdel Adhami	CC-1	PayPal	500.00
02/05/2024	Abdel Adhami	CC-1	PayPal	1,000.00
02/18/2024	Abdel Adhami	CC-1	PayPal	500.00
02/22/2024	Abdel Adhami	CC-1	PayPal	1,000.00
02/29/2024	Abdel Adhami	CC-1	PayPal	1,000.00
03/08/2024	Abdel Adhami	CC-1	PayPal	1,000.00
03/14/2024	Abdel Adhami	CC-1	PayPal	1,000.00
03/21/2024	Abdel Adhami	CC-1	PayPal	1,000.00
03/28/2024	Abdel Adhami	CC-1	PayPal	300.00
04/02/2024	J.L. O Beauty Supply LLC	Organization 2	Zelle	10.00
04/03/2024	Abdel Adhami	Organization 2	Zelle	1,000.00
04/06/2024	J.L. O Beauty Supply LLC	Organization 2	Zelle	100.00
04/07/2024	Abdel Adhami	Organization 2	Zelle	200.00
04/10/2024	Abdel Adhami	Organization 2	Zelle	300.00
05/02/2024	Abdel Adhami	CC-1	PayPal	300.00
05/04/2024	Abdel Adhami	CC-1	PayPal	300.00
05/10/2024	Abdel Adhami	CC-1	PayPal	500.00
05/13/2024	Abdel Adhami	CC-1	PayPal	250.00
05/28/2024	Abdel Adhami	CC-1	PayPal	500.00
06/07/2024	Abdel Adhami	CC-1	PayPal	1,000.00
06/26/2024	Abdel Adhami	CC-1	PayPal	500.00
07/10/2024	Abdel Adhami	CC-1	PayPal	1,000.00
07/11/2024	Abdel Adhami	CC-1	PayPal	500.00
07/15/2024	Abdel Adhami	CC-1	PayPal	700.00
07/31/2024	Abdel Adhami	CC-1	PayPal	200.00
08/02/2024	Abdel Adhami	CC-1	PayPal	600.00

Date	Sender	Recipient	Method	Amount
08/14/2024	Abdel Adhami	CC-1	PayPal	1,000.00
08/19/2024	Abdel Adhami	CC-1	PayPal	300.00
09/03/2024	Abdel Adhami	CC-1	PayPal	1,000.00
09/09/2024	Abdel Adhami	CC-1	PayPal	200.00
09/10/2024	Abdel Adhami	CC-1	PayPal	1,000.00
09/19/2024	Abdel Adhami	CC-1	PayPal	200.00
09/23/2024	Abdel Adhami	CC-1	PayPal	1,000.00
09/30/2024	Abdel Adhami	CC-1	PayPal	200.00
10/03/2024	Abdel Adhami	CC-1	PayPal	250.00
10/08/2024	Abdel Adhami	CC-1	PayPal	400.00
10/14/2024	Abdel Adhami	CC-1	PayPal	500.00
10/19/2024	Abdel Adhami	CC-1	PayPal	1,000.00
10/21/2024	Abdel Adhami	CC-1	GoFundMe	226.45
10/26/2024	Abdel Adhami	CC-1	PayPal	400.00
10/28/2024	Abdel Adhami	CC-1	PayPal	1,000.00
11/02/2024	Abdel Adhami	CC-1	PayPal	250.00
11/09/2024	Abdel Adhami	CC-1	PayPal	1,000.00
11/16/2024	Abdel Adhami	CC-1	PayPal	1,000.00
11/25/2024	Abdel Adhami	CC-1	GoFundMe	945.00
12/04/2024	Abdel Adhami	CC-1	GoFundMe	948.24
12/07/2024	Abdel Adhami	CC-1	GoFundMe	212.64
12/12/2024	Abdel Adhami	CC-1	GoFundMe	948.69
01/03/2025	Abdel Adhami	CC-1	GoFundMe	954.68
01/12/2025	Abdel Adhami	Organization 1	PayPal	500.00
01/12/2025	Abdel Adhami	Organization 1	PayPal	1,200.00
01/13/2025	Abdel Adhami	Organization 1	PayPal	200.00
01/31/2025	Abdel Adhami	Organization 1	PayPal	500.00
02/09/2025	Abdel Adhami	Organization 1	PayPal	250.00
02/22/2025	Abdel Adhami	Organization 1	PayPal	500.00
02/24/2025	Abdel Adhami	Organization 1	PayPal	100.00
02/24/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
03/01/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
03/07/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
03/11/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
03/19/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
03/24/2025	Abdel Adhami	Organization 1	PayPal	500.00
04/03/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
04/11/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
04/21/2025	Abdel Adhami	Organization 1	PayPal	500.00
04/26/2025	Abdel Adhami	Organization 1	PayPal	900.00
05/03/2025	Abdel Adhami	CC-1	PayPal	2,000.00
05/09/2025	Abdel Adhami	CC-1	PayPal	200.00
05/15/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
05/25/2025	Abdel Adhami	CC-1	PayPal	1,000.00

Date	Sender	Recipient	Method	Amount
06/01/2025	Abdel Adhami	CC-1	PayPal	2,000.00
06/10/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
07/01/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
07/11/2025	Abdel Adhami	Organization 1	PayPal	500.00
07/18/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
07/25/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
07/30/2025	Abdel Adhami	Organization 1	PayPal	350.00
08/02/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
08/12/2025	Abdel Adhami	Organization 1	PayPal	300.00
08/16/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
08/31/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
09/14/2025	Abdel Adhami	Organization 1	PayPal	1,000.00
10/02/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
10/06/2025	Abdel Adhami	Organization 1	PayPal	700.00
10/21/2025	Abdel Adhami	Organization 1	PayPal	1,200.00
11/01/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
11/14/2025	Abdel Adhami	Organization 1	PayPal	1,500.00
12/01/2025	Abdel Adhami	Organization 1	PayPal	2,000.00
12/15/2025	Abdel Adhami	Organization 1	PayPal	1,500.00
01/01/2026	Abdel Adhami	Organization 1	PayPal	2,000.00
01/13/2026	Abdel Adhami	Organization 1	PayPal	1,200.00
02/01/2026	Abdel Adhami	Organization 1	PayPal	2,000.00
02/15/2026	Abdel Adhami	Organization 1	PayPal	1,200.00
03/03/2026	Abdel Adhami	Organization 1	PayPal	2,000.00
04/03/2026	Abdel Adhami	Organization 1	PayPal	2,000.00
04/16/2026	Abdel Adhami	Organization 1	PayPal	1,000.00
			Total	94,118.11

Date	Sender	Recipient	Method	Amount
05/18/2022	Omar Adhami	Safaa Alzaq	Western Union	600.00
03/26/2023	Omar Adhami	Safaa Alzaq	Western Union	500.00
04/05/2023	Omar Adhami	Safaa Alzaq	Western Union	1,000.00
10/22/2023	Omar Adhami	CC-1	PayPal	191.63
10/25/2023	Omar Adhami	CC-1	PayPal	95.48
02/01/2024	Omar Adhami	CC-1	PayPal	191.16
03/19/2024	Omar Adhami	CC-1	PayPal	958.11
04/02/2024	Omar Adhami	Organization 2	Zelle	1,000.00
08/26/2024	Omar Adhami	CC-1	PayPal	286.75
09/29/2024	Omar Adhami	CC-1	PayPal	382.63
10/29/2024	Omar Adhami	CC-1	PayPal	191.60
11/06/2024	Omar Adhami	CC-1	PayPal	94.90
01/09/2025	Omar Adhami	CC-1	PayPal	191.20
01/24/2025	Omar Adhami	CC-1	PayPal	1,339.61

Date	Sender	Recipient	Method	Amount
01/25/2025	Omar Adhami	CC-1	PayPal	1,336.49
02/02/2025	Omar Adhami	CC-1	PayPal	95.59
03/23/2025	Omar Adhami	CC-1	PayPal	95.65
03/24/2025	Omar Adhami	Organization 1	PayPal	95.64
05/03/2025	Omar Adhami	CC-1	PayPal	95.52
05/29/2025	Omar Adhami	CC-1	PayPal	95.71
06/25/2025	Omar Adhami	Organization 1	PayPal	95.68
07/19/2025	Omar Adhami	Organization 1	PayPal	95.64
10/31/2025	Omar Adhami	Organization 1	PayPal	191.24
12/20/2025	Omar Adhami	Organization 1	PayPal	100.00
01/14/2026	Omar Adhami	Organization 1	PayPal	500.00
01/15/2026	Omar Adhami	Organization 1	PayPal	500.00
02/26/2026	Omar Adhami	CC-1	PayPal	1,000.00
03/15/2026	Omar Adhami	Organization 1	PayPal	100.00
			Total	11,420.23

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 4
(Conspiracy to Commit Money Laundering)

1. The allegations contained in Counts 1 and 2 of this Indictment are repeated and realleged as if fully set forth herein.

2. Beginning at a time unknown but not later than on or around February 2021, and continuing through on or about September 2026, in the Eastern District of Louisiana and elsewhere, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, and others known and unknown, did knowingly and willfully conspire and agree to commit money laundering by collecting and transferring funds via wire transfers to Hamas through its intermediaries, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

3. It was a part and object of the conspiracy that **ABDEL ADHAMI** and **OMAR ADHAMI**, and others known and unknown, would and did transport, transmit, and transfer monetary instruments and attempt 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, conspiracy to provide material support to Hamas, and conspiracy to commit wire fraud, as charged in Counts 1 and 2 of this Indictment, in violation of United States Code, Sections 2339(B) and 1956(a)(2)(A).

All in violation of Title 18, United States Code, Sections 1956(h), 1956(f) and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1, 2, 3, and 4 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the terrorism offenses alleged in Counts 1 and 2, of this Indictment the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, and others known and unknown, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), 981(a)(1)(G), and 2335b(g)(5) and Title 28, United States Code, Section 2461(c), any property, real or personal, involved in said offense, and any property traceable to such property; any and all assets, foreign and domestic, of the defendants; any and all assets, foreign and domestic, affording the defendants a source of influence over any entity or organization engaged or planning said offense; any and all assets, foreign or domestic, acquired or maintained 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 commission of the offense and/or the defendants' assets.

3. As a result of the wire fraud offense alleged in Count 3, of this Indictment, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, and others known and unknown, shall

forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), 982(a)(2)(A), and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Count 2 of this Indictment, including but not limited to a sum of money representing the amounts of process obtained as a result of the offense.

4. As a result of the money laundering offense alleged in Count 4, of this Indictment, the defendants, **ABDEL ADHAMI** and **OMAR ADHAMI**, and others known and unknown, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in said offense, or any property traceable to such property, including, but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

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

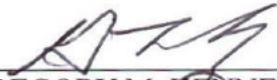
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot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

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendants up to the value of said property.

A TRUE BILL:

FC

DAVID I. COURCELLE
UNITED STATES ATTORNEY



GREGORY M. KENNEDY
Assistant United States Attorney
Louisiana Bar Roll Number 20896

New Orleans, Louisiana
September 17, 2026

FORM OBD-34
No. _____

UNITED STATES DISTRICT COURT

Eastern District of Louisiana
Criminal Division

THE UNITED STATES OF AMERICA

vs.

**ABDEL ADHAMI
OMAR ADHAMI**

INDICTMENT
INDICTMENT FOR PROVIDING MATERIAL
SUPPORT TO A FOREIGN TERRORIST
ORGANIZATION, CONSPIRACY TO PROVIDE
MATERIAL SUPPORT TO A FOREIGN TERRORIST
ORGANIZATION, CONSPIRACY TO COMMIT WIRE
FRAUD, AND MONEY LAUNDERING

VIOLATIONS:

- 18 U.S.C. § 2339B
- 18 U.S.C. § 1343
- 18 U.S.C. § 1956
- 18 U.S.C. § 2



A true bill.

Filed in open court this _____ day of _____ A.D. 2026.

Clerk

Bail, \$ _____

[Signature]

Gregory M. Kennedy
Assistant United States Attorney

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENTMatter Sealed: ☐ Juvenile ☒ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT EASTERN
DISTRICT OF LOUISIANA Divisional Office

Name and Office of Person
Furnishing Information on Laura Orth
THIS FORM ☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (504) 680-3041

Name of Asst.
U.S. Attorney Gregory M. Kennedy
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Special Agent Scott Foster, FBI

☐ person is awaiting trial in another Federal or State Court
(give name of court)

☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)

☒ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded under

SHOW
DOCKET NO.

MAG. JUDGE
CASE NO.

26-mj-112

Place of
offense St. Tammany Parish County

CASE NO.

USA vs.

Defendant: ABDEL ADHAM

Address: In custody: USMS

☐ Interpreter Required Dialect: _____

Birth Date 1991 ☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number XXX-XX-1732

DEFENDANT

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date 9/15/2026 or Date Transferred to Federal Custody _____

☒ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 4 (for this defendant only)

Offense Level (1, 3, 4)	Title & Section/ (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Count(s)
4	18 U.S.C. § 2339B	Providing material support to a foreign terrorist org.	1
4	18 U.S.C. § 2339B	Conspiracy to provide material support to a foreign terrorist org.	2
4	18 U.S.C. § 1343, 2	Conspiracy to commit wire fraud	3
4	18 U.S.C. § 1956(h), 1956(f), 2	Conspiracy to commit money laundering	4

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENTMatter Sealed: ☐ Juvenile ☒ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT EASTERN
DISTRICT OF LOUISIANA Divisional OfficeName and Office of Person
Furnishing Information on
THIS FORM Laura Orth
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (504) 680-3041Name of Asst.
U.S. Attorney Gregory M. Kennedy
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Special Agent Scott Foster, FBI

☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)☒ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.

26-mj-111

Place of
offense St. Tammany Parish County

CASE NO.

USA vs.

Defendant: OMAR ADHAMI

Address: In custody: USMS

☐ Interpreter Required Dialect: _____Birth
Date 1993☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number XXX-XX-3378

DEFENDANT

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date 9/15/2026 or Date Transferred to Federal Custody _____

☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 4 (for this defendant only)

Offense Level (1, 3, 4)	Title & Section/ (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Count(s)
4	18 U.S.C. § 2339B	Providing material support to a foreign terrorist org.	1
4	18 U.S.C. § 2339B	Conspiracy to provide material support to a foreign terrorist org.	2
4	18 U.S.C. § 1343, 2	Conspiracy to commit wire fraud	3
4	18 U.S.C. § 1956(h), 1956(f), 2	Conspiracy to commit money laundering	4

TO: DOCKET CLERK

SEALED

26-211

X MAGISTRATE CASE No: 26-mj-111 & 26-mj-112

**If magistrate case was previously allotted to a District*

Judge- provide DJ's name and section **SECT.PMAG.3**

OR

NO MAGISTRATE PAPERS WERE FOUND

for

NAME: ABDEL ADHAMI, OMAR ADHAMI

Initials: nch

If you receive this note without any initials, please return the entire packet to criminal desk.

Thank you