



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

May 7, 2025

The Honorable Stewart D. Aaron
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Tarek Bazrouk*, 25 Cr. 203

Dear Judge Aaron:

The Government respectfully submits this letter in support of its request that defendant Tarek Bazrouk be detained pending trial. Bazrouk was arrested this morning following a pattern of physical violence against Jewish victims and after being indicted for three felony hate crimes.

As alleged in the Indictment, on at least three separate occasions, Bazrouk physically assaulted and injured Jewish individuals at protests relating to the Israel/Gaza war. During each of these incidents, Bazrouk quickly resorted to violence, targeting Jewish protestors. Despite being arrested after each incident (and several other times in the intervening months), Bazrouk remained undeterred and continued to use violence and intimidation to target Jews across Manhattan. Notably, Bazrouk fled the scene after two of the incidents (Counts Two and Three), and was already in handcuffs when he committed the assault in the remaining incident (Count One). Bazrouk's danger to the community and risk of flight are further underscored by his support for terrorist groups, his avowed hatred of Jews, his history of violent threats and intimidation, including of a Jewish child at a New York City School, and his access to numerous weapons—including weapons found in a search of his apartment just this morning. Accordingly, as set forth below, there is no combination of conditions that will reasonably assure the safety of the community and Bazrouk's appearance in court.

I. Background

A. Bazrouk's Serial Assaults of Jewish Protestors

Bazrouk is a 20-year-old New Yorker. As charged in the Indictment, over the course of approximately 9 months, Bazrouk physically assaulted at least three Jewish individuals at protests concerning the Israel/Gaza war. The assaults occurred in April 2024, December 2024, and January 2025.

1. April 15, 2024 – Bazrouk Assaults a Jewish Protestor in Lower Manhattan

On April 15, 2024, Bazrouk—while wearing a green headband typically worn by Hamas terrorists—attended a protest concerning the Israel/Gaza war in Lower Manhattan, outside the New York Stock Exchange. During the protest, Bazrouk walked into a section of the rally populated by pro-Israel protesters, many of whom were carrying Israeli and American flags. Bazrouk was holding a Palestinian flag. After Bazrouk shouted at the pro-Israel protestors, one of them grabbed his flag. Bazrouk then lunged at the individual who took his flag, after which Bazrouk was arrested by NYPD officers on scene and placed in handcuffs.

As Bazrouk was being escorted to an NYPD vehicle, Bazrouk kicked a different individual—Victim-1, a Jewish college student—in the lower stomach. At the time of the assault, Victim-1 was standing near other Jewish protestors, who were wearing kippahs,¹ carrying Israeli flags, and singing Jewish songs.

Evidence of Bazrouk’s April 2024 hate crime includes, among other things, witness statements and videos of the incident. One video of the incident also appears to capture Bazrouk yelling—seconds after the assault—“Allahu Akbar,” an Arabic phrase meaning “God is great” that radical Islamic extremists have proclaimed while carrying out terrorist attacks. Below is an image of Bazrouk right before he kicked Victim-1.



Bazrouk’s communications corroborate the witness testimony and videos of the incident. For example, on April 15, 2024, at approximately, 5 p.m., Bazrouk described the incident in a text message as follows: “Long story short I was waving the flag in front of them and they was mad I of them snatched it out my hand and then I started swinging at all of them and then the cops arrested

¹ A kippah or yarmulke is a brimless skullcap that is traditionally worn by Jewish men on their heads.

me and when they was walking me I started kicking the Zionist cuz they was chatting USA.” On April 21, 2024, Bazrouk further discussed the incident in a text message exchange with another individual. Bazrouk sent the link to an article in the New York Post from April 18, 2024 titled “Columbia student kicked and told to ‘kill himself’ as his US flag is set on fire at NYC pro Palestinian rally,” and wrote, “Damn they did me bad,” before noting that “[t]hey got my whole gov smh”—an apparent reference to the article including Bazrouk’s legal (or “Government”) name. When Bazrouk was asked how the journalist obtained his “full name,” Bazrouk responded “I think cuz he filed a police report / But I can’t wear the green headband no more”—an apparent reference to the green Hamas headband he was wearing during the incident.²

2. December 9, 2024 – Bazrouk Assaults a Jewish Protestor Outside Columbia University

Approximately eight months later, on December 9, 2024, Bazrouk assaulted another individual at a protest relating to the Israel/Gaza war next to the campus of Columbia University in Manhattan. The victim of the second assault—Victim-2—is a Jewish student at Columbia University.

On the date of the assault, Victim-2 and his brother were present at a protest in the vicinity of 117th Street and Broadway, right outside Columbia’s campus. During the protest, Victim-2 and his brother were wearing kippahs and Victim-2 had an Israeli flag draped around his shoulders. During the protest, Victim-2 sang Jewish songs.

As the protest continued, Bazrouk began calling Victim-2 and other protestors with Victim-2 “Nazis” and stating, in sum and substance, that Jews stole the land and have no history there. Bazrouk, with his mouth covered by a flag, then stole an Israeli flag from Victim-2’s brother and fled.

Victim-2 and his brother followed Bazrouk in an effort to retrieve their flag. As Victim-2 and his brother were talking to other protestors, Bazrouk snuck up to the side of Victim-2 and struck him in the face with a closed fist. Bazrouk then fled into the crowd. Evidence of Bazrouk’s December 2024 assault includes, among other things, statements from multiple witnesses and videos of the incident.

² As part of the same conversation, Bazrouk appears to describe an incident at Columbia University on April 21, 2024, in which Bazrouk lit a flare. After Bazrouk states that he “lit the flare,” the other individual replied, “u should of lit someone on fire.” Bazrouk responded, “I was thinking abt it tbh / It was too many of them tho / Otherwise I would’ve hurted them.” This protest—and the anti-Jewish rhetoric used during the protest—were heavily covered in news reporting. *See* New York Post, “Anti-Israel protester screams ‘Go back to Poland’ at demonstrators with Israeli flag outside Columbia, harrowing video shows” (Apr. 21, 2024), <https://nypost.com/2024/04/21/us-news/anti-israel-protester-screams-at-demonstrators-with-israeli-flag-outside-columbia-u-go-back-to-poland/>.

3. January 6, 2025 – Bazrouk Assaults a Jewish Protestor in Gramercy

On January 6, 2025, Bazrouk assaulted yet another Jewish victim—Victim-3—at a protest concerning the Israel/Gaza war near 1st Avenue and East 18th Street in Manhattan.

At this protest, Victim-3 was wearing an Israeli flag around his shoulders, along with a hat with an Israeli flag. He was also wearing a chain with a Jewish star on it. At various times throughout the protest, Victim-3 sang Jewish songs and chanted Jewish or Hebrew slogans.

During the protest, Bazrouk, who was wearing a keffiyeh, made contact with Victim-3's shoulder and then wrapped his foot around Victim-3's ankle. After trying to push Bazrouk away, Victim-3 stated, "Get the fuck away from me." Bazrouk then proceeded to punch Victim-3 in the nose with a closed fist and stated, "Fuck you, Nazi." After he was punched, Victim-3 pulled down Bazrouk's keffiyeh to see his face. Bazrouk then fled into the crowd.

Ten days later, on January 16, 2025, Victim-3 attended another protest regarding the Israel/Gaza war in Times Square. During the protest, an individual with a keffiyeh pointed at Victim-3 and said, in substance and in part, that Victim-3 had been assaulted at the last rally. Although part of the individual's face was covered by a keffiyeh, Victim-3 later stated that the individual's height, build, voice, and eyes matched that of the individual who punched him ten days earlier. After Victim-3 alerted a nearby police officer about this exchange and the January 6 incident, the NYPD brought the individual in the keffiyeh to a nearby NYPD precinct. After the keffiyeh obstructing the individual's face was removed, Victim-3 identified the individual—Bazrouk—as his assailant during the January 6 incident.

B. Bazrouk's Anti-Jewish Animus

Bazrouk's text messages, social media presence, and vocal support for anti-Semitic terrorist groups further show his bias against Jews, underscoring the strength of the evidence regarding his motivation for the three charged assaults, and demonstrating the ongoing danger he poses to the community.

1. Bazrouk's Anti-Semitic Text Messages

Bazrouk's private text messages lay bare his anti-Semitic motivations. As detailed below, in these messages, Bazrouk identified himself as a "Jew hater," labeled Jews "worthless," exhorted "Allah" to "get us rid of [Jews]," called an acquaintance a "Fucking Jew," and told a friend to "slap that bitch" in reference to a woman with an Israel sticker on her laptop. A sampling of the text messages in which Bazrouk made anti-Semitic statements is reproduced below:

• October 2, 2024

Bazrouk	Yk what I need to do on Oct
Bazrouk	I need too whip a Zionist wallah

- **September 17, 2024**

Associate-1	Bro everyone is jewish there
Bazrouk	Ik fuck them
Bazrouk	They are worthless
Bazrouk	Inshallah Allah get us rid of them
Associate-1	This other girl too / they started talking about this jewish party i was like omg stfu
Bazrouk	Lmaooooo talk about Hamas
Bazrouk	Bro I gotta pyo
Bazrouk	Yk I got family that are ..
Bazrouk	I didn't even know 😂
Bazrouk	I'm mad happy wallah

- **September 17, 2024**

Associate-1	imma throw up
Associate-1	this girl next to me has a greetings from israel sticker on her laptop imma crash out
Bazrouk	Slap that bitch
Bazrouk	Take her laptop and throw it

- **June 19, 2024**

Bazrouk	Owner of the building he was there yesterday when we got raided
Associate-2	Fuck him
Bazrouk	He took of the stickers I put lol
Bazrouk	Fucking Jew

- **May 19, 2024**

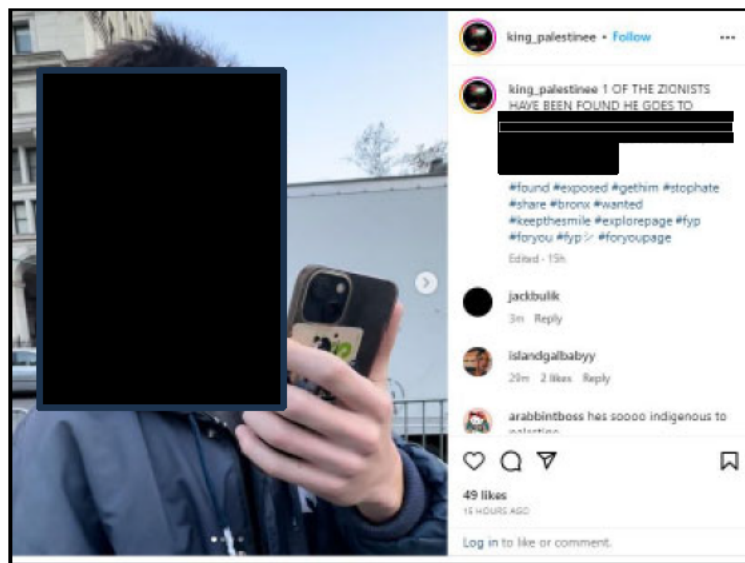
Bazrouk	Kal I'm a Jew hater 😂
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- **February 9, 2024**

Associate-2	Tee do you like Jewish
Bazrouk	No way

2. Bazrouk's Social Media Presence

Bazrouk's pattern of hostility towards Jews is further evidenced by his social media presence. For example, Bazrouk (using the username king_palestinee³) posted a photo on Instagram of what appears to be a young boy, along with the following message, as depicted below: "1 OF THE ZIONISTS HAVE BEEN FOUND HE GOES TO [NAME OF SCHOOL] LOCATED AT [ADDRESS] #found #exposed #gethim #stopphate #share #bronx #wanted #keepthesmile #explorepage #fyp #foryou #fyp :/ #foryoupage."



The school listed in the post is a Jewish school located in the Bronx, New York, which provides a Judaic and secular education to students from pre-school through eighth grade.

The profile information for Bazrouk's Instagram account also includes the text "Ismail Haniyeh" followed by a green heart. Haniyeh was chairman of Hamas's Politboro until his death in 2024 and was designated in 2018 by the State Department as a Specially Designated Global Terrorist under Executive Order 13224. On September 3, 2024, a Complaint was unsealed in this District charging Haniyeh and five other senior Hamas leaders with various terrorism, murder conspiracy, and sanctions-evasion charges. *See United States v. Haniyeh et al.*, 24 Mag. 438 (S.D.N.Y).

³ Among other things, the subscriber phone number and the subscriber email address from the Instagram account both belong to Bazrouk.

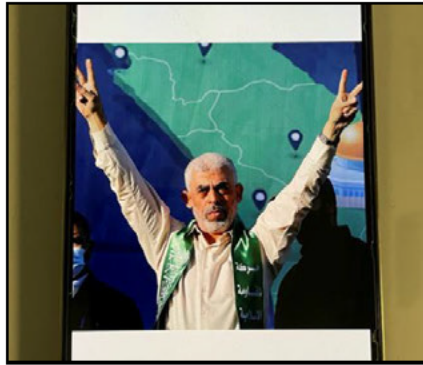
3. Bazrouk's Support for Hamas and Hizballah

Beyond his social media presence, Bazrouk's phones contains extensive additional pro-Hamas and pro-Hizballah propaganda, evidencing his support for organizations that have murdered thousands of Jews and Israelis, killed and wounded U.S. citizens, and repeatedly avowed that they want to destroy both the United States and Israel. For example, Bazrouk is a member of a chat group that received regular updates from the al-Qassam Brigades chief spokesperson, Abu Obeida. Bazrouk also possessed on his phones the below images of individuals wearing a keffiyeh and a green headband, the type typically worn by members of Hamas and by Bazrouk in his April 2024 assault.

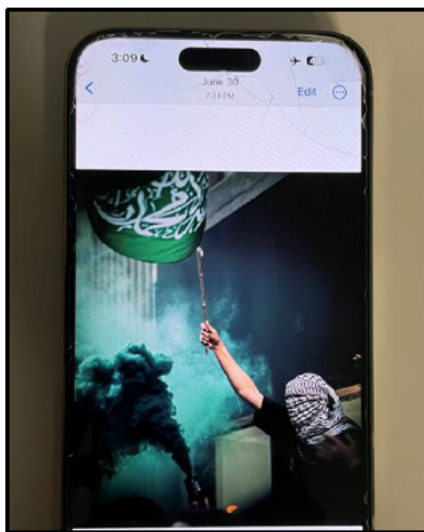


Bazrouk's phones also contained the below image of Yahya Sinwar wearing a scarf with the flag of Hamas on it. Sinwar is one of the founders of the al-Qassam Brigades⁴ and, until his death in October 2024, was the leader of Hamas and is credited for being the architect behind the October 7 Hamas massacres. Sinwar was also charged in *United States v. Haniyeh*, 24 Mag. 438 (S.D.N.Y) with various terrorism, murder conspiracy, and sanctions-evasion charges.

⁴ Hamas carries out terrorist attacks and armed conflict through the Izz al-Din al-Qassam Brigades, its military wing. The al-Qassam Brigades have conducted suicide bombings and carried out other terrorist attacks within Israel, Gaza, and the West Bank, and have done so for decades. These attacks have included large-scale bombings against Israeli civilian targets, small-arms attacks, improvised roadside explosives, and rocket attacks. The al-Qassam Brigades frequently target civilians and have killed and injured thousands of individuals, including American citizens.



The below images—an individual waving the Hamas flag and a post celebrating the al-Qassam Brigades, Hamas’ military wing—were also found on Bazrouk’s phones.



Content on Bazrouk’s phones similarly demonstrates his support for Hizballah. His phones contained the below image of Mohammad Hussein Srour, a senior Hizballah drone commander. The yellow and red logo on the bottom left of the image is the Hizballah public affairs logo.

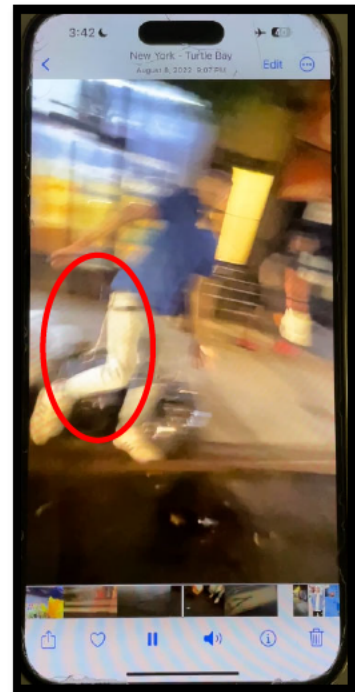


4. Other Evidence of Bazrouk's Anti-Jewish Animus

In addition to the above-mentioned examples, other content on Bazrouk's phones evidences his anti-Jewish animus and his endorsement of violence to advance his cause. For example, Bazrouk possessed on his phones a video of an individual in a keffiyeh with what appears to be a knife in his hand on a public street. A screenshot of the video is depicted below.



Bazrouk also possessed images and videos showing attacks on other people. Below on the left is an image of an individual in a keffiyeh appearing to assault another person, and on the right is a screenshot from a video depicting an individual wearing tzitzit (depicted in the red circle)—tassels worn on traditional garments by Jewish males—being chased on a public street.



5. Other Evidence from Bazrouk's Phones

Bazrouk's text messages, images, and other phone contents also indicate that he appears to have access to firearms, ammunition, and other weapons. For example, the following images were either sent or received by Bazrouk through SMS message⁵:



⁵ The file path for these images includes the term "SMS/Attachments," which based on information from FBI forensic examiners, we understand to mean that the images were either sent or received by the user of Bazrouk's phone via SMS message.

Moreover, below is a sampling of communications in which Bazrouk discusses his access to weapons with others⁶:

- **June 4, 2024**

Associate-1	menace wallah [We shot them [n*****s] 😂]
Bazrouk	I was about too 🍷 someone
Associate-1	i got time yallahh [Long story] / omg [I was about too 🍷 someone] / w ur orbeez ⁷ gun i hopee
Bazrouk	No real / I dead don't even wanna talk about it

- **May 21, 2024**

Bazrouk	You know if they do something too u ima have too defend you
Associate-1	whatever u do don't hit a cop / hit as many zionists as u want / just not a cop / i don't want u to get life LMFAO
Bazrouk	You know I gothcu and if I don't my gun do 😂

- **May 2, 2024**

Bazrouk	🔥🔥🔥 I need that knife
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- **April 19, 2024**

Bazrouk	These Zionist feening to dox me smh
Associate-1	whooo [These Zionist feening to dox me smh] / i'll kill them [These Zionist feening to dox me smh]
Bazrouk	The yahoodi ⁸ pages / If I ever see 1 of them ima boom them fr fr

- **March 6, 2022**

Bazrouk	My knives just came
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⁶ The brackets in the messages appear to indicate that the author of that particular message is replying to a prior message in the thread.

⁷ An orbeez gun is water pellet gun that shoots water-absorbent beads.

⁸ "Yahoodi" in Hebrew and Arabic translates to "Jew."

Associate-3	U got any better knives then the one u got me ?
Bazrouk	Yo bring the knife tmm for jaydan

C. Bazrouk's Other Arrests

In addition to his arrests for the above-described assaults on Jewish protestors, Bazrouk has a history of other arrests. According to law enforcement records, Bazrouk has been arrested on at least 12 separate occasions, including for [REDACTED] operating a drug factory, possessing a controlled substance with intent to distribute, reckless endangerment, obstructing governmental administration, [REDACTED] and the assaults charged in this case. In particular, NYPD records and records from the Hartford Police Department indicate the following⁹:

- At least 6 of Bazrouk's arrests arose from his conduct at Israel/Gaza protests.
- [REDACTED]
- [REDACTED]
- In 2023, Bazrouk was arrested in possession of a MetroCard with an altered magnetic strip, as he attempted to evade a subway fare. At the time of his arrest, Bazrouk was in possession of metal brass knuckles.
- In July 2024, near Union Square in Manhattan, Bazrouk was observed on the sidewalk—in a large crowd of approximately 1,000 people—holding a lit and smoking flare, covering bystanders with smoke. When a police officer attempted to arrest Bazrouk, he ran away while holding the flare, which was still lit and billowing out smoke.
- In December 2024, Bazrouk was arrested in Hartford, Connecticut for operating a drug factory, possessing a controlled substance, and possessing a controlled substance with intent to sell. At the time of the arrest, Bazrouk was operating a business illegally selling THC products. During a search of the business, law enforcement officers found large quantities of marijuana products, including 7 pounds of unpackaged marijuana, almost 1,000 pre-rolled marijuana cigarettes, and large numbers of THC edibles and THC vapes. The resale value of the seized products totaled approximately \$25,000.
- [REDACTED]

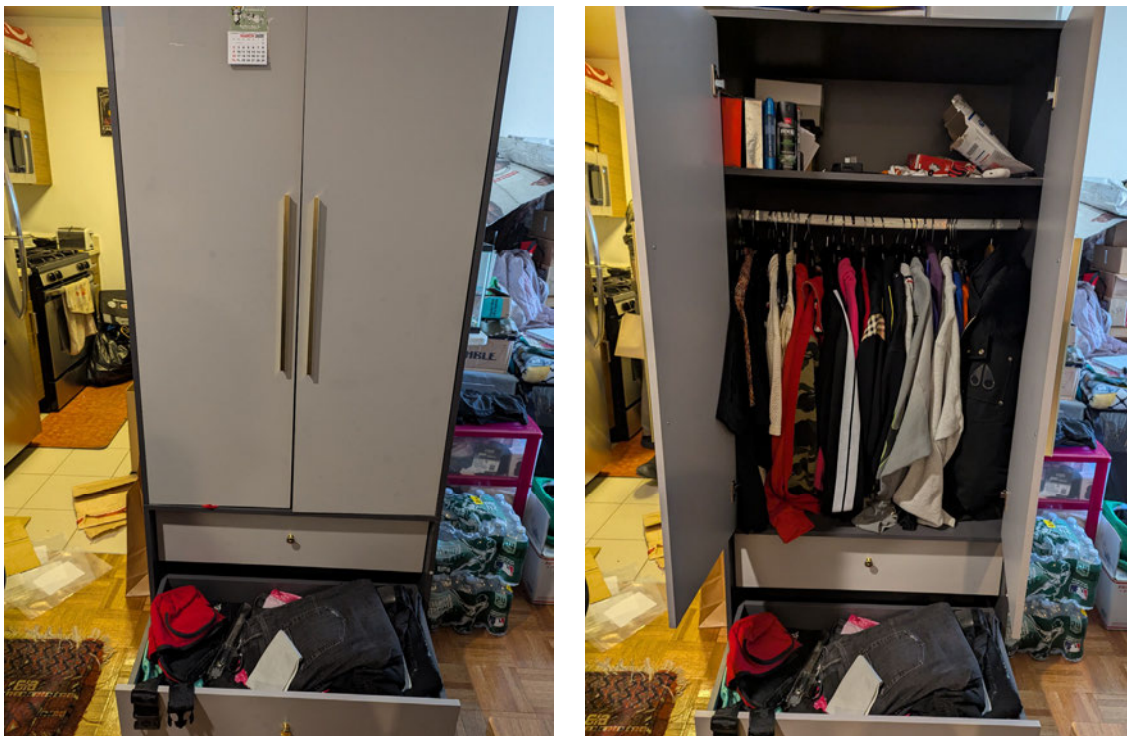
⁹ These records reflect arrests, not convictions. We are continuing to investigate the dispositions. Nevertheless, Bazrouk's willingness to engage in the offense conduct despite his many arrests demonstrates that he has not been deterred by his numerous prior interactions with law enforcement.

D. Procedural History

On May 6, 2025, a grand jury in this District returned an indictment charging Bazrouk with three counts of committing hate crimes, in violation of 18 U.S.C. § 249. Count One charges the April 2024 assault; Count Two charges the December 2024 assault; and Count Three charges the January 2025 assault. Bazrouk was arrested earlier today.

E. Weapons and Cash Found in Bazrouk's Apartment

Pursuant to a judicially authorized search warrant, while arresting Bazrouk this morning, law enforcement agents searched the Manhattan apartment where he lives with other family members. During the search, agents examined a cabinet, as depicted below:



The cabinet contained Bazrouk's personal possessions—including his wallet (with his driver's license inside), court papers relating to his prior arrests and contacts with law enforcement, and clothes that appear to be his. Inside Bazrouk's cabinet, agents found (1) an airsoft gun (*i.e.*, a replica firearm that fires small, spherical projectiles instead of bullets) that looks identical to a real

gun; (2) spent shell casings from a real gun; (3) brass knuckles; (4) a hunting knife; (5) a pocket knife; and (6) an additional knife, as depicted below:





As noted above, Bazrouk has recently been arrested on numerous occasions, including for felony offenses. We are continuing to investigate the dispositions of those cases. To the extent that Bazrouk is currently under indictment for any offense punishable by imprisonment for a term

exceeding one year, his possession of the spent shell casings from a real gun may constitute a violation of 18 U.S.C. § 922(n).

Elsewhere in Bazrouk's apartment, law enforcement agents found what appears to be the same black jacket that Bazrouk was wearing during the December 2024 assault discussed above:



Inside a pocket of that jacket, agents found a fourth knife (a switchblade), as depicted below:



Finally, also inside Bazrouk's apartment, agents found a safe containing hundreds of thousands of dollars in cash. No explanation was provided for the source of that cash.

II. Legal Standard

Under the Bail Reform Act, 18 U.S.C. §§ 3141 *et seq.*, federal courts are empowered to order a defendant's detention pending trial upon a determination that the defendant is either a danger to the community or a risk of flight. 18 U.S.C. § 3142(e). A finding of risk of flight must be supported by a preponderance of the evidence. *See, e.g., United States v. Jackson*, 823 F.2d 4, 5 (2d Cir. 1987); *United States v. Chimurenga*, 760 F.2d 400, 405 (2d Cir. 1985). A finding of dangerousness must be supported by clear and convincing evidence. *See, e.g., United States v. Ferranti*, 66 F.3d 540, 542 (2d Cir. 1995); *Chimurenga*, 760 F.2d at 405.

Each charged count here constitutes a crime of violence as defined in the Bail Reform Act. *See* 18 U.S.C. §§ 3142(f)(1)(A) and 3156(a)(4); *see United States v. Howald*, 104 F.4th 732, 742 (9th Cir. 2024) (classifying Section 249 as a crime of violence when considering defendant's motion to dismiss a count charging 18 U.S.C. § 924(c)); *United States v. Sotelo*, 16 Cr. 10062 (JTM), 2016 WL 7373921, at *1 (D. Kan. Dec. 20, 2016) (classifying Section 249 as a crime of violence for bail purposes); *United States v. Hammet*, 13 Cr. 11 (JAM), 2013 WL 1192779, at *3 (E.D. Cal. Mar. 22, 2013) (same). The Court can—and should—consider that the charges include multiple crimes of violence in evaluating the defendant's dangerousness. *See United States v. Balde*, No. 16 CR. 130 (KPF), 2020 WL 1673247, at *3 (S.D.N.Y. Apr. 6, 2020) (noting that in determining bail, the Court is required to consider, among other things, “whether the offense is a crime of violence”).

In determining whether the defendant is entitled to bail, the Court considers the factors set forth in 18 U.S.C. § 3142(g). These factors are: (1) the nature and circumstances of the offense, including whether the offense is a crime of violence; (2) the weight of the evidence against the person; (3) the history and characteristics of the defendant; and (4) the nature and seriousness of the danger to any person or the community that would be posed by the defendant's release. Where a judicial officer concludes after a hearing that “no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of any other person and the community, such judicial officer shall order the detention of the person before trial.” 18 U.S.C. § 3142(e)(1). As set forth below, all four factors weigh heavily against release in this case.

III. The Defendant Should Be Detained

Based on the facts detailed above—including Bazrouk's repeated violent assaults, his failure to be deterred by multiple prior arrests, his stated animus against Jews, his support for anti-Semitic terrorist groups, and his access to weapons—Bazrouk poses a serious danger to Jewish New Yorkers. If released, there is a significant risk that Bazrouk will do exactly what he did following his prior arrests: quickly return to committing acts of violence against Jews. And given Bazrouk's criminal exposure, the strength of the evidence against him, and his overseas ties,

Bazrouk poses a significant flight risk as well. The Government therefore moves for Bazrouk to be detained pending resolution of the charges.

A. Nature and Circumstances of the Charged Offenses

As an initial matter, Bazrouk is charged with multiple crimes of violence based on pernicious and persistent assaults directed at innocent Jewish victims. These assaults all targeted Jews expressing their First Amendment rights, all were initiated by Bazrouk, and all resulted in injury to the victims. During each of the assaults, Bazrouk made his motivations clear: during two of the assaults he called his victims “Nazis”—a term with particular salience and malice when directed at Jews—and during the third, Bazrouk wore a Hamas headband, aligning himself with a group dedicated to the murder of Jews. Indeed, the persistent pattern of the defendant’s assaults is extraordinary, especially considering the defendant’s repeated targeting of victims of a particular faith. Moreover, the timing of these assaults, spanning many months, demonstrates that this was not a momentary lapse in judgment for the defendant but a deliberate pattern of conduct to terrorize Jewish victims.

Notably, Bazrouk committed these assaults despite being arrested several times for his conduct at Israel/Gaza protests, including following the April 2024 and December 2024 assaults, and in March 2024 and twice in July 2024. The defendant’s continuation of his violent behavior even after being apprehended by the authorities demonstrates a severe and sustained disregard for the law. Combined with Bazrouk’s clear anti-Semitic animus, and his prior arrest history, this conduct more than establishes that he is a danger to the community.

B. Weight of The Evidence

The proof of the charged offenses is overwhelming. The defendant’s assaults were witnessed by many bystanders, including the victims, and significant portions of the incidents were captured on video. Bazrouk’s involvement in the attacks is further corroborated by his own text messages and post hoc statements discussing the incidents. Evidence of Bazrouk’s motivation for conducting the attacks—namely his anti-Semitic animus—is likewise overwhelming, and includes his own statements during the attacks, his text messages expressing his hatred for Jews, and his possession of reams of propaganda celebrating groups and individuals dedicated to the murder of Jews. Accordingly, the weight of the evidence also strongly supports detention.

C. Defendant’s History and Characteristics

The defendant’s history and characteristics also militate powerfully in favor detention. For one, his arrest history record reflects a blatant disregard for the rule of law. That Bazrouk has been arrested at least 6 times for his conduct at Israel/Gaza protests shows that the defendant’s conduct in this case is far from an aberration. Indeed, his pattern of assaulting Jews demonstrates a troubling history of violent and anti-Semitic conduct. Moreover, during the two attacks for which Bazrouk was not already handcuffed—the December 2024 and April 2025 assaults—Bazrouk immediately fled following his assaults, showing an inclination to flee to avoid apprehension by law enforcement.

. In his text

messages, Bazrouk even bragged to a friend about being profiled by NYPD's Crime Stoppers program on more than one occasion.

Beyond his repeated assaults, the defendant has shown his propensity for violence elsewhere, including in the above-referenced text messages. (See, e.g., "I was about too 🍌 someone"; "You know I gotchu and if I don't my gun do 😁"; "If I ever see 1 of them ima boom them fr fr"). His phone contents further indicate that he has access to weapons, including firearms, ammunition, and knives. Just this morning, Bazrouk was found to be in possession of spent shell casings, brass knuckles, four knives, and a replica firearm that—to any other individual—would appear to be a real firearm. Finally, as described above, Bazrouk's prior arrest history, [REDACTED] is highly concerning. Indeed, none of Bazrouk's arrests—including those tied to the assaults charged in the Indictment—has deterred him from continuing to engage in violence and continuing to assault Jewish individuals.

D. Danger Posed by Defendant's Release

The serial nature of Bazrouk's assaults demonstrates by clear and convincing evidence that he poses a danger of physically harming others he perceives as Jewish. Bazrouk's private messages and his celebration of Hamas—including his decision to wear a Hamas headband while assaulting a Jewish student in April 2024—make clear that his animosity towards Jews is deep-seated. In short, given the nature of the defendant's crimes, his repeated engagement in violent, illegal activity, and the fact that prior arrests have failed to deter him, there are no conditions that can reasonably be expected to ensure the safety of the community if he were released.

E. Bazrouk's Risk of Flight

Bazrouk should also been detained based on his risk of flight. Bazrouk is facing serious criminal charges and, as described above, the evidence against him is overwhelming. His potential exposure, including a potentially significant incarceratory sentence, provide him with ample incentive to flee. Bazrouk also appears to have the means to flee, given his sales of large amounts of marijuana and the fact that hundreds of thousands of dollars in unexplained cash was found inside his apartment. And Bazrouk appears to have significant ties overseas. For example, his travel records indicate that in September and October of 2024, Bazrouk traveled to the Middle East (to the West Bank and Jordan) for approximately three weeks. As noted above, on September 17, 2024, while he was on this trip, Bazrouk texted a friend, stating, in sum and substance, that he had found out that he has family members who are members of Hamas, which made him "mad happy." Giving the timing of these text messages, it appears that Bazrouk learned, while traveling to the Middle East, that certain of his family members in the region are members of Hamas, a discovery met with much satisfaction by the defendant. As discussed above, Bazrouk's text messages and social media make clear his allegiance to Hamas and its goals. Under these circumstances, there is a serious risk that Bazrouk will flee to join his family members in the Middle East in order to avoid facing these criminal charges.

IV. Conclusion

Bazrouk's conduct reflects a troubling pattern of violent assaults on Jewish individuals. The Government respectfully submits that, for the reasons stated above, the evidence is sufficient to meet the Government's burden, that even the strictest of supervisory conditions cannot protect the community and prevent his flight, and that the Court should order the defendant detained.

Respectfully submitted,

JAY CLAYTON
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