

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

United States of America

v.

JONATHAN HUNTER KRAMER

Case No.

26-1518

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 12, 2026 in the county of Allegheny in the
Western District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. § 924(h)

Offense Description

Count One: Receipt or Transfer of a Firearm or Ammunition Knowing or
 Having Reasonable Cause to Believe that Such Firearm or Ammunition Will
 Be Used to Commit a Felony or a Federal Crime of Terrorism

This criminal complaint is based on these facts:

See attached Affidavit in Support of Criminal Complaint

☒ Continued on the attached sheet./s/Gregory Battaglia*Complainant's signature*Gregory Battaglia, Special Agent, FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: 09/13/2026*Judge's signature*City and state: Pittsburgh, PennsylvaniaHonorable Maureen P. Kelly, U.S. Magistrate Judge*Printed name and title*

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Magistrate No. 26-1518

JONATHAN HUNTER KRAMER

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Gregory Battaglia, being duly sworn, hereby depose and state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. This Affidavit is made in support of a criminal complaint charging JONATHAN HUNTER KRAMER (“KRAMER”) with Receipt or Transfer of a Firearm or Ammunition Knowing or Having Reasonable Cause to Believe that Such Firearm or Ammunition Will Be Used to Commit a Felony or a Federal Crime of Terrorism, in violation of Title 18, United States Code, Section 924(h).

2. I have served as a Federal Bureau of Investigation (“FBI”) Special Agent since April 2022 and have been employed by the FBI since 2012. As a Special Agent with the FBI, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I am also a “Federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure.

3. I am currently assigned to the Joint Terrorism Task Force (“JTTF”) in the FBI’s Pittsburgh Division. In this capacity, I am charged with investigating possible violations of federal

criminal law. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including functioning as a case agent on international terrorism investigations. I have received training and have gained experience in the conduct of counterterrorism investigations, the execution of federal search warrants and seizures, and the identification and collection of computer-related evidence.

4. This Affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter. The facts set forth in this Affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause. However, I have not omitted any fact that may tend to undermine a finding of probable cause. Additionally, unless otherwise indicated, wherever in this Affidavit I assert that an individual made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement. Furthermore, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

5. For the reasons set forth below, there is probable cause to believe that, on or about September 12, 2026, in the Western District of Pennsylvania, the defendant, Jonathan Hunter KRAMER, did knowingly receive a firearm and ammunition, to wit: a Defense Procurement Manufacturing Services (DPMS) Panther Arms semiautomatic rifle, and 5.56 caliber ammunition, knowing or having reasonable cause to believe that the firearm and ammunition would be used to commit a felony or a Federal crime of terrorism, including Providing, Attempting to Provide, and

Conspiring to Provide Material Support or Resources to a Designated Foreign Terrorist Organization, contrary to Title 18, United States Code, Section 2339B, a felony, and a Federal crime of terrorism, in violation of Title 18, United States Code, Section 924(h).

II. STATUTORY PROVISIONS

6. Title 18, United States Code, Section 924(h) prohibits “knowingly receiv[ing] or transfer[ing] a firearm or ammunition, or attempt[ing] or conspir[ing] to do so, knowing or having reasonable cause to believe that such firearm or ammunition will be used to commit a felony [or] a Federal crime of terrorism” The term “Federal crime of terrorism” is defined as “an offense that—(A) is calculated to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct; and (B) is a violation of (i) 2339B (relating to providing material support to terrorist organizations)” *Id.* § 2332b(g)(5).

7. Title 18, United States Code, Section 2339B prohibits “knowingly providing material support or resources to a foreign terrorist organization or attempt[ing] or conspir[ing] to do so.” For purposes of Section 2339B, “material support or resources” includes “any property, tangible or intangible, or service, including currency or monetary instruments or financial instruments, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” 18 U.S.C. § 2339B(g)(4) (incorporating by reference 18 U.S.C. § 2339A(b)(1)). For purposes of Section 2339B, a “terrorist organization” means “an organization designated as a terrorist organization under Section 219 of the Immigration and Nationality Act.” *Id.* § 2339B(g)(6).

III. THE ISLAMIC STATE OF IRAQ AND AL-SHAM (“ISIS”)

8. On or about October 15, 2004, the United States Secretary of State (“Secretary”) designated al- Qaeda in Iraq (“AQI”), then known as Jam’at al Tawid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act (“INA”) and as a Specially Designated Global Terrorist (“SDGT”) under section I(b) of Executive Order 13224. On or about May 15, 2014, the Secretary amended the designation of AQI as an FTO under Section 219 of the INSA and as a SDGT entity under section 1 (b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (“ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

9. The State Department has reported that, among other things, ISIS has committed systematic abuses of human rights and violations of international law, including indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of their identity, kidnapping of civilians, forced displacement of Shia communities and minority groups, killing and maiming of children, rape, and other forms of sexual violence. According to the State Department, ISIS has recruited thousands of foreign fighters to Iraq and Syria from across the globe and leveraged technology to spread its violent extremist ideology and to incite.

10. On or about September 21, 2014, ISIS spokesperson Abu Muhammad al-Adnani¹ called for attacks against citizens—civilian or military—of the countries participating in the United States-led coalition against ISIS.

11. Based on my review of open source materials, I know that ISIS has claimed responsibility for the following terrorist attacks, among others: (1) on or about November 13 and 14, 2015, a group of individuals carried out attacks in Paris, France, which killed approximately 130 people; (2) on or about March 22, 2016, a group of attackers carried out bombings in Brussels, Belgium, which killed at least 32 people; (3) on or about February 16, 2017, a suicide bomber carried out an attack in Sehwan, Pakistan, which killed at least 90 people; and (4) on or about May 22, 2017, a suicide bomber carried out an attack in Manchester, England, which killed at least 23 people.

12. Based on my training and experience, my personal participation in this and other investigations involving ISIS, and my conversations with other law enforcement agents who have been involved in ISIS-related investigations, I have learned the following:

a. To gain supporters, ISIS, like many other terrorist organizations, spreads its message using social media, internet platforms, and email. Using these platforms, ISIS posts and circulates videos and updates of events in Syria, Iraq, and other ISIS-occupied areas, in English and Arabic, as well as other languages, to draw support to its cause.

b. ISIS has encouraged followers who are unable to travel to the Middle East to instead conduct attacks in other countries. For example, on or about March 31, 2015, the user of Twitter account @AbuHu55ain, believed to be used at the time by an ISIS member located in Syria, tweeted: “Lone Wolves Rise Up”; “If you can’t make the hijrah, dont sit at home & give up . . .

¹ Al Adnani was reportedly killed in Syria in August 2016.

ignite a bomb, stab a kaffir, or shoot a politician!"; "if you came here, you'd be on the frontline fighting, right? But u couldn't come here, so why not fight the kuffar over there?"; and "i always see in the media brothers getting caught making hijrah, brothers know that your jihad is not over just because you got stopped."

c. ISIS has disseminated a wide variety of recruiting materials and propaganda through social media. These include photographs and videos depicting ISIS's activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS and members of other Islamic extremist organizations.

d. ISIS followers frequently use a variety of electronic communications systems to attempt to avoid having their communications monitored by law enforcement.

IV. PROBABLE CAUSE

15. The allegations in this criminal complaint pertain to KRAMER knowingly receiving a semiautomatic rifle and ammunition, knowing or having reasonable cause to believe that the firearm and ammunition would be used to commit a felony or Federal crime of terrorism. Based on my training, experience, and investigation to date, including a prior investigation into KRAMER, I am familiar with KRAMER's expressed desire to materially support ISIS, including his desire to carry out a violent attack on behalf of ISIS.

KRAMER's Juvenile History

16. On March 11, 2023, the FBI received a tip regarding an online user with display name "Nikolas Cruz" and username @ShootIntoACrowd that was utilizing the online forum, Telegram. The anonymous tip advised that user "Nikolas Cruz" posted threatening statements alluding to an unidentified act to occur within three months as well as documents on how to make explosives, C4, and car bombs. The complainant identified "Nikolas Cruz" as the administrator

for the online group “Reddit Shitposting Central” and the user of Discord Account “NikolasCruz#9970.” Through federal legal process, including grand jury subpoenas and search warrants, law enforcement officers identified KRAMER as the user of display name “Nikolas Cruz.”

17. In April 2023, I obtained a federal search warrant for KRAMER’s Discord activity, based on KRAMER’s threatening statements discussed above. A review of Discord’s records revealed that KRAMER was in direct communication with a partially identified 14-year-old from Germany. The production reflected that KRAMER knew the juvenile was 14 years old. During their communications, KRAMER asked the juvenile to send Child Sexual Abuse Material (CSAM) of himself to KRAMER. The juvenile in turn sent multiple video and image files to KRAMER containing CSAM.

18. Also in April 2023, I participated in the execution of a federal search warrant at 74 Sterrett Street, Valencia, PA 16059, where KRAMER resided with his parents in the Western District of Pennsylvania, which included the search and seizure of certain electronic devices located within the residence. During the search, I identified on KRAMER’s laptop a recording of KRAMER that depicted his *baya’t*, an Islamic pledge of allegiance, to the then leader of ISIS, Abu Bakr Al Baghdadi.

19. In April 2023, following the search of the residence, KRAMER, then a juvenile, was charged by Pennsylvania state authorities for his role in a plot to commit a mass casualty incident. KRAMER was also charged with possessing CSAM. In September 2023, KRAMER was adjudicated delinquent to: (1) PA Title 18 Section 6312 Subsection D (Sexual Abuse of Children, Child Pornography) and (2) PA Title 18 Section 908 (Prohibited Offensive Weapons).

The Pennsylvania state court remanded KRAMER to Pathways Adolescent Center, which is located in Oil City, Pennsylvania.

20. In December 2024, the FBI communicated with the Juvenile Probation Office in Butler County, Pennsylvania, regarding KRAMER. At the time, the Juvenile Probation Office informed the FBI that a “black banner” was identified in KRAMER’s belongings while at the Pathways Adolescent Center.² The FBI was also informed that KRAMER’s family was not involved in KRAMER’s treatment program to the extent the Juvenile Probation Office traditionally prefers to see and did not appear to support or initiate many of the strategies provided in support of KRAMER’s long-term treatment.

21. In March 2026, KRAMER, who was 20 years old at that time, was released from Pathways Adolescent Center and has since resided at his family’s home address, 74 Sterrett Street, Valencia, PA, 16059 in the Western District of Pennsylvania.

Online FBI Tip and Subsequent FBI Interview of Complainant

22. On March 19, 2026, following KRAMER’s release from Pennsylvania state custody, an anonymous individual made an online tip to the FBI regarding KRAMER. The complainant provided the following:

- a. KRAMER was released from “juvie” a week ago and his parents give him unlimited and unmonitored internet access and a cell phone.
- b. KRAMER keeps ordering “mysterious” packages, and his parents do not check because KRAMER “needs privacy.”

² Based upon my training and experience, I believe the “black banner” is a reference to an ISIS flag. The ISIS flag is a modernized black banner containing a rough, stylized, and handwritten Arabic calligraphy.

c. KRAMER obtained a cell phone and has stated that he is “talking to his friends from before” when he was charged in Pennsylvania with “terrorism, threats to use a weapon of mass destruction and terrorist threats.”

23. Based upon the content and context of the anonymous tip, I identified the individual who provided the anonymous complaint to the FBI. On April 1, 2026, I conducted a voluntary interview with the complainant.³ The complainant is closely associated with KRAMER and expressed their concern that KRAMER, who was previously charged for planning an act of mass violence, has unfettered access to a cell phone, computer, and the internet. The complainant also provided that KRAMER expressed his intention to reconnect with the “friends” he had during the time period where he planned a mass act of violence. The complainant also provided that KRAMER was receiving numerous packages in the mail. Additionally, the complainant told agents that KRAMER recently obtained a cell phone and provided agents with KRAMER’s phone number.

**KRAMER’s Reddit Accounts – “u/i_love_femboys6969,” “u/slopdestroyer,” and
“u/ILoveGayRobloxPorn”**

24. As discussed above, in April 2023, I participated in the search of KRAMER’s residence, which resulted in the location, search, and seizure of KRAMER’s laptop computer. Forensic analysis of KRAMER’s laptop computer in that prior investigation revealed a list of usernames and passwords associated with the device. One listed username and password combination was for a Reddit account bearing the username “i_love_femboys6969.” There were six other online accounts associated with the device (including Spotify, OpenVPN, and PayPal)

³ Given the complainant’s close association with KRAMER, I have omitted their identity from this Affidavit in order to mitigate the risk of reprisal. Nevertheless, I have, to the extent possible, corroborated the information provided by the complainant. As a result, I believe that the complainant is a credible source of information.

wherein the accounts' username was identified as `persistedsphinx@gmail.com`, which, as discussed further below, is one of KRAMER's email addresses.

25. In May 2026, the FBI submitted legal process to Reddit for account and subscriber information associated with KRAMER's known telephone numbers and e-mail addresses, including `persistedsphinx@gmail.com`. According to Reddit's records, the Reddit accounts "`u/ILoveGayRobloxPorn`" and "`u/i_love_femboys6969`" were registered using KRAMER's email address, `persistedsphinx@gmail.com`. According to Reddit's records, "`u/i_love_femboys6969`" was registered with his known phone number was last accessed on May 28, 2026, from IP address 24.144.188.42. As discussed further below, this is the same IP address from which KRAMER has made Amazon purchases.

26. According to Reddit's records, the account "`u/IloveGayRobloxPorn`" was last accessed on May 5, 2026, from IP address 24.144.188.1. On March 27, 2026, I reviewed the results of legal process from Armstrong Utilities, Inc., an internet service provider, which indicated that as of March 27, 2026, IP address 24.144.188.1 was the "Subscriber Public IP" associated with the physical address of KRAMER's residence.

27. On May 5 and 6, 2026, I reviewed publicly available posts, comments, and activity associated with publicly available Reddit user "`u/i_love_femboys6969`." On or about May 5, 2026, user "`u/i_love_femboys6969`" stated the user was "open to moderating any subreddit[,]" and in response to other subreddits the user previously moderated, "`u/i_love_femboys6969`" stated that his alternate Reddit user account was "`u/slopdestroyer`." Based upon my training and experience, I know alternate online accounts are used by a single individual to delineate or conceal the activity conducted on one account from the activity conducted on a separate account.

28. On or about April 11, 2026, “u/slopdestroyer,” in response to a Reddit user asking to identify the source of a video from a Reddit post, wrote: “the second is from an isis video, don’t ask how I know.”

29. On or about May 12, 2026, “u/slopdestroyer” posted a video entitled “Anime Slop” to the r/FreshBeans sub-reddit. The video, which is one minute and nine seconds in length, started with an anime-style scene before cutting to different videos of Hamas propaganda depicting armed Hamas fighters and supporters. The text overlaid on top of the video stated, “STOP WATCHING HARAM PALESTINE NEEDS YOU.”

30. On or about May 12, 2026, “u/slopdestroyer” posted a video entitled “Roblox Slop” to the r/FreshBeans sub-reddit. The nineteen-second video depicts Roblox-style⁴ characters as ISIS fighters and supporters in various positions and encampments. The audio is that of an ISIS nasheed,⁵ titled “For the Sake of Allah”. The text overlaid on top of the video stated, “FOR THE SAKE OF ALLAH, We will March to the gates, TO THE PARADISE WHERE OUR MAIDENS AWAIT, WE ARE MEN THAT LOVE DEATH, JUST AS YOU LOV YOUR LIFE, WE ARE THE SOLDIERS THAT FIGHT IN THE DAY AND THE NIGHT.”

31. On July 17, 2026, I reviewed publicly available posts, comments, and activity associated with publicly available Reddit user “u/ILoveGayRobloxPorn.” On or about May 2026, “u/ILoveGayRobloxPorn” created a post entitled “Average Usa” to the r/ppnojutsu sub-reddit. The post depicted multiple individuals in dark tactical style clothing obtaining weapons and grenades with the overlaid text which stated, “Me And My Friends Getting Ready For School.” This video

⁴ Roblox is an online platform and game creation system where users can play millions of different user-generated 3D games and experiences.

⁵ Based on my training and experience, an ISIS nasheed is a vocal chant used as a propaganda tool to recruit members, celebrate violence, and spread fear.

is identical to a video KRAMER posted on March 4, 2023, to a Telegram group KRAMER administered. At the time, KRAMER posted the video alongside the caption, “Me and the boys gearing up to go to our local school.”

Discord Account User 846843876165550121

32. On May 7, 2026, I reviewed the results of legal process from Discord containing Discord records associated with KRAMER’s known phone number. Discord identified accounts associated with the phone number and accounts associated with KRAMER’s previous-known telephone number. Discord also reported “alternate” accounts associated with KRAMER’s identifiers, which used identical IP addresses and/or online browser cookies as KRAMER’s accounts. One of the “alternate” accounts was Discord Account User 965786483866869812, which FBI identified in the 2023 investigation as KRAMER’s account. Another “alternate” account reported by Discord was Discord Account User 846843876165550121.

33. Discord’s records revealed that Discord account 846843876165550121 was created on May 25, 2021, and was registered to email address zyndic@proton.me. The account was last accessed on May 6, 2026, from IP address 24.144.188.1, which as discussed above, resolves to KRAMER’s residence.

34. On May 7, 2026, I reviewed publicly available posts, comments, and activity for Discord Account User 846843876165550121. On April 25, 2026, Discord Account User 846843876165550121 posted a comment stating, “dm @I Fear No Myriad to ask for partnership”. On the same date, I reviewed the publicly available profile for Discord user “I Fear No Myriad.” That Discord account displayed a profile photograph of a masked individual in front of the ISIS flag.

35. On July 21, 2026, I reviewed further results of legal process from Discord, which confirmed Discord Account 846843876165550121 and Discord Account 965786483866869812 were both accessed using identical IP Addresses and online browser cookies.

Amazon Account User “Jonathan Kramer”

36. On June 3, 2026, I reviewed purchases made from an Amazon account bearing the name “Jonathan Kramer” and the billing and mailing address: 74 Sterrett Street, Valencia, PA 16059. The account was registered using email address persistedsphinx@gmail.com.

37. On May 18, 2026, the user purchased pepper spray, and on May 23, 2026, the user purchased a five-inch fixed blade knife. Both purchases were completed from IP address 24.144.188.42, the same IP address associated with KRAMER’s “u/i_love_femboys6969” Reddit account activity.

Google Accounts Associated with KRAMER

38. On March 26, 2026, in response to legal process, Google confirmed that the below Google accounts were associated with KRAMER’s known telephone number:

persistedsphinx@gmail.com	VERIFIED; Account Recovery, Android
kramerjonathan022@gmail.com	VERIFIED; Account Recovery, Android
hotrodcars04@gmail.com	VERIFIED; Account Recovery, Android
bullcrapnow@gmail.com	VERIFIED; Account Recovery
dogshitfun@gmail.com	VERIFIED; Account Recovery

SimpleX Account User “Hamza Al Rashid” and SimpleX Group “The Brotherhood”

39. On or about July 9, 2026, SITE Intelligence Group⁶ provided information to the FBI regarding SimpleX⁷ user “Hamza Al Rashid.” At the time, “Hamza Al Rashid” reportedly claimed affiliation with and support of ISIS, and was having discussions with others about imminent attacks. As discussed further below, based upon “Hamza Al Rashid’s” statements, past online behavior, personal history, and pattern of life, I believe KRAMER is the creator and user of the “Hamza Al Rashid” SimpleX account.

A. “Hamza Al Rashid’s” SimpleX Activity

40. On or about July 14, 2026, I reviewed the results of legal process from SITE Intelligence Group regarding SimpleX user “Hamza Al Rashid” and the SimpleX Group titled, “The Brotherhood.” According to SITE’s records, “Hamza Al Rashid” was the creator and administrator of this group, which was created on or about May 5, 2026.

41. According to SITE’s records, on May 5, 2026, “Hamza Al Rashid” stated, “I am working on arranging the files and nasheeds into a single downloadable link [...] I also have explosive manuals if you are interested.”⁸

42. According to SITE’s records, on May 6, 2026, “Hamza Al Rashid” asked another member of the group, “what region of the world are you located in? we could possibly coordinate

⁶ According to its website, the SITE Intelligence Group uses open-source data collection methods to provide early warning analysis and identification of threat actors in the FTO, Violent Extremist (VE), Terrorism and VE Financing, and Bomb and Weapons Manuals domains.

⁷ According to its website, SimpleX is a private and encrypted messenger. SimpleX does not provide users with a user identification number. Users do not need an e-mail address or telephone number to register an account. Rather, users connect with each other via a private connection link or QR code.

⁸ Content within quotations in the Affidavit is taken verbatim from the original text and any spelling or grammatical errors are contained in the original.

an attack inshallah.” “Hamza Al Rashid” replied, “im sorry to hear you are surrounded by kuffar,⁹ I too am surrounded. but with the help of allah anything is possible, if you are able to financially and resourcefully commit attacks, spread the truth, or rally our brothers, that is a form of jihad, the highest honor one can attain in the sight of allah.”

43. According to SITE’s records, on May 10, 2026, “Hamza Al Rashid” stated “i am going to work on a file including ways to wage war against the kuffar with relative ease, anonymity. for now here is an improvised napalm type molotov recipe. fire is a good way of destroying many kuffars properties and land as well as their lives. make sure if using this to always remain anonymous and with your face and hands covered.”

44. According to SITE’s records, on May 12, 2026, “Hamza Al Rashid” provided a link and cautioned others to open the link in a TOR browser or other secured environment. A review of the hyperlinked document, created by “Hamza Al Rashid” on May 9, 2026, detailed “methods of violence Against the Kuffar, as well as tools that can be useful to remain anonymous.” The document opened with the message, “Welcome my brothers, this document is an unofficial creation for use by members of the Islamic State.” The document also stated, “please keep in mind that this is not meant as a ‘how to’ guide, it is merely meant to inform. More To come.” The document contained the following section and sub-section headings, amongst others:

a. “Jihad”:

- i. “Fire: Fire is an extremely useful tool to cause irreplaceable damage to The kuffars homes,land, and cost millions, if not billions of dollars in damage if used correctly. While fire leads to less deaths, it causes much more chaos/displacement.”

⁹ Based on my training and experience, I know that kuffar means a nonbeliever of Islam, which is often used by foreign terrorist organizations.

- ii. “Areas that are good to target include enclosed spaces such as nightclubs, theaters, concerts and apartment buildings/hotels and schools with low security. not only does the fire carry risk of death, in events of mass confusion, people will normally stampede each other trying to escape, leading to more possible deaths.”
- iii. “You have many options on how to attack, including using molotovs, strategic fuel placement and lighting, etc. Here is a quick way to make a stronger molotov than traditional gasoline/oil made ones.”
- iv. “Poison is a very effective weapon, chemicals such as Cyanide, ricin and Abrin are extremely deadly. the most easily available for use and productions would be Abrin, which comes from the Rosary Pea, and ricin, which comes from the Castor Bean. both are easily purchasable and extractable, we wont discuss how to preform these process as this guide is not for that purpose.”
- v. “Vehicles. Specifically semi trucks, they are obviously huge and strong. if you get your hands on one and you know a very large protest or event if happening nearby, you could carjack one at a truck stop. police cant PIT you, and tire Spikes dont effect semi truck tires as easily. if you are skilled in welding, you could add armor to your vehicle, including adding weapons onto it like knives, spikes, rams, etc. make sure you are using a vehicle that is Very high in torque, similar to a tow truck or hauling truck, and make sure it is lower to the ground to avoid running literally over things., but if

your not using a semi, its very recommended to add a ram or a protection bar to the front of the vehicle.”

- vi. “Firearms/Pcp Weapons: Firearms are probably the most universal method of violence, they are very effective for a targeted assault, here are some tips/methods to ensure max casualties. 1: its recommended to use 2 firearms while committing an attack. 2: i recommend carrying a semi auto rifle for those who are at a sizeable distance away, 20+ feet to be exact as well as as many magazines that would be required for the amount of people at the place of assault. 3: i recommend as your main second weapon a shotgun. specifically the Remington 870 MCS, chambered with 3 inch magnum buckshot, as this weapon offers good spread, a large ammo carrying capacity and strong power. 4: if the remington is not available then i suggest Mossberg 590A1 with the same 3 inch magnum shells, but each barrel is different.”
- vii. “Alternatives to firearms: if you are not able to reliably obtain a firearm, pcp weapons are a legal alternative, albeit more expensive. Pcp rifles are basically a firearm, but it uses CO2 instead of gunpowder, therefore in most places it is not considered a “firearm” making it legal for felons, or prohibited persons to use. these are not very powerful unless you get certain types/versions. these are good mostly for long ranged attacks, requiring mostly headshots to be most effective. i suggest these, but each person needs to research what kind they want depending on what they are planning to use it for. smaller handgun types of Pcp guns should be used for quick single

target headshots from the side of the head or back. 1: FX Crown (.457 Caliber) 2: Benjamin Bulldog (.457 Caliber) 3: FX Maverick (.457 Caliber)”

b. “Methods to increase your jihads destruction”

- i. “1: use smoke bombs/Pepper grenades. pepper grenades are basically timed release cans of pepper spray. these are available for civilian use and purchase. they are mostly useful to throw into crowded places to blind the kuffar to prevent escape and resistance. they can also be used to impede the advance of law enforcement as long as they do not have gas masks. (You will need a gas mask when using these). popular brands include (for the pepper grenades) these can be found on popular sites such as amazon. you may need to resort to different methods if you are not able to order to your country using popular sites. 1: Clear Out (Aerko International) 2: Fox Labs smoke grenades are usually easy to find/make, im sure you will be able to find out how to obtain then if you search for a little bit”
- ii. “2: Distract emergency services. the premise of this is to direct a majority of emergency services away from the area you are planning to attack. this can be done in many ways multiple times at once. 1: call in a false emergency using a burner phone at a location away from where you plan to attack. say something like “there is a person livestreaming at (insert address/area) that is planning to shoot people. 2: set multiple fires across a large area away from where you plan to attack, example is setting a populated building on fire, moving a block away, setting another, then again as many times as you want, although doing this you will need a mode of

transportation to get to the area you want to commit an attack, and if doing this, you need to ditch the car or transportation you used and proceed on foot to the area you plan to attack. it is best to make any fires seem like accidents, and best to exaggerate any emergency to make it seem as serious as possible, you could also throw very loud firecrackers in an area, call emergency services and say that there is a shooter, then quickly leave towards the area you plan to attack.”

c. “Escape”

- i. “NOTE: in order for this to be even be worth trying, you need to understand the area and situations such as ‘how fast can i escape’ ‘how fast is the emergency services response time’ ‘are there any cameras nearby, including doorbell cameras, businesses cameras, dash cams, etc’ ‘do i plan to stay and wait it out or get as far as possible’ and ‘will they figure out my identity?’ each one of these comes with its own specific problems and solutions, so preparation is very much needed. for now i will only include a method to ‘hide out’ in a shelter, and get as far as possible.”

45. According to SITE’s records, on May 20, 2026, “Hamza Al Rashid” stated, “I might be able to carry out an operation soon against the kuffar, please pray for my success brothers.”

46. According to SITE’s records, in response to a post by another user on May 24, 2026, detailing how “a great punishment will fall upon” the kaffir, “Hamza Al Rashid” responded, “that is a good idea brother, if possible you should record such events and when the attack is over release the videos. It would potentially help others with ideas on what to do, and show the Islamic state has not been slowed down by the kuffars constant attacks.” On the same date, “Hamza Al Rashid”

stated, “im currently trying to find ways to synthesize ricin or cyanide, or some other deadly chemical [...] i wish to inject ricin or cyanide into places such as grocery stores inside water/food with a syringe, or going to food events, preferably synagogues and putting the chemicals in their food and drink [...] i believe poison is a very good way to wage war against the kuffar.”

47. According to SITE’s records, on May 20, 2026, “Hamza Al Rashid” stated, “please share this brothers with anyone you may know who can assist in our operations. this is the most secure messenger available avoid telegram, matrix, threema, and briar.”

48. According to SITE’s records, on June 4, 2026, “Hamza Al Rashid” stated, “brothers, i think it would be a good idea to use drones such as those being used in ukraine and russia that have explosives strapped to it, all you must do is get a drone and make an explosive charge you manually detonate with a phone [...] see earlier chats for instructions.”

49. According to SITE’s records, on June 8, 2026, “Hamza Al Rashid” stated, “Please know i do not glorify ‘terrorism’ i am not a member of the islamic state and this is all purely done out of curiosity and hobby [...] to anyone who thinks i am ‘Supporting’ The islamic state.” Based on my training and experience, I know that terrorism subjects who are plotting attacks will at times attempt to protect themselves from investigation and prosecution by distancing themselves from the attacks or claiming innocent intent. Based on my training, experience, and investigation to date, including all of “Hamza Al Rashid’s” other communications detailed herein, I believe that “Hamza Al Rashid” intended to carry out a terrorist attack in support of ISIS.

50. On June 17, 2026, in response to a post by another user thanking “Hamza Al Rashid” for sharing propaganda videos, “Hamza Al Rashid” stated, “i appreciate it, may Allah grant victory to the islamic state and its Righteous Believers [...] i do this for the islamic state Mashallah.” Another user stated in response, “it’s the least we can do for our beloved brothers.” “Hamza Al

Rashid” then stated, “are you able to safely prepare an attack or any kind? or are you able to spread the truth across the internet?” The other user responded, “Both, the first with some planning, inshaAllah. The second I already do [...] Akhi is this private chat just been us? No one else is talking if it’s public group.” “Hamza Al Rashid” lastly stated, “this is not a private chat, if you would like to share more details with me you can message me, this app is 100% anonymous, thats why i chose it, always avoid apps like telegram.”

51. On June 18, 2026, “Hamza Al Rashid” stated, “i dont believe people are actually serious about the islamic state, which is a shame.”

52. On September 9, 2026, “Hamza Al Rashid” stated in response to an earlier comment, “i do not know anyone personally. i am preparing for my mission, i just need a weapon and as soon as i have that i am ready.”

B. “Hamza Al Rashid’s” Statements Are Consistent with KRAMER’s Past Online Activities, Personal History, and Pattern of Life

53. Based upon “Hamza Al Rashid’s” statements, past online behavior, personal history, and pattern of life, I believe KRAMER is the creator and user of the “Hamza Al Rashid” SimpleX account.

54. On June 29, 2026, an FBI Confidential Human Source (FBI CHS)¹⁰ engaged with “Hamza Al Rashid” on SimpleX.

55. On July 2, 2026, “Hamza Al Rashid” provided the FBI CHS with details about his planned attack, including locations and areas with “choke points” such as a “building with many cooridors using smoke grenades.” In March 2023, KRAMER, utilizing display name “Nikolas

¹⁰ CHS is known to the FBI and has a history of providing credible and reliable information. CHS is paid for assisting the Government with investigations and utilizes FBI-approved devices to capture and record content related to investigations. The information provided by CHS cited herein has been verified by the FBI to the extent possible.

Cruz,” posted details about his proposed mass casualty attack plan, which included the use of “chokepoints” and a gas mask.

56. On June 30, 2026, “Hamza Al Rashid” informed the FBI CHS of his intent to purchase two firearms before stating, “but the problem is I cannot get a hold of a firearm legally” and “I am restricted by felony.” The FBI CHS asked if “Hamza Al Rashid” was being watched, to which “Hamza Al Rashid” stated, “yes, I believe I am being watched [...] I don’t believe they watch my house but track my devices as well as my usage of networks.” Again, on or about July 1, 2026, “Hamza Al Rashid” told the FBI CHS that he had lost contact with other associates “after my felony arrest” for an “assault charge.” Although KRAMER’s 2023 juvenile charges did not include either a felony or an assault charge, I believe “Hamza Al Rashid’s” statements of being “restricted by felony,” “after my felony arrest,” and of officials watching his house are largely consistent with KRAMER’s previous state charges and subsequent conditions of probation. Lastly, based upon my training and experience, I know that sometimes individuals will not provide truthful information about their criminal history to mask their identity, to appear more credible, or to avoid embarrassment when speaking with other individuals they see as peers.

57. On or about June 30, 2026, “Hamza Al Rashid” wrote to the FBI CHS, “apologies, I am usually able to speak early morning . . . would 7PM mecca time be good? If so ill try and see you then, I am pretty busy recently so I will do my best.” Based upon my training and experience, I know that “7PM mecca time” is 12:00 PM Eastern Daylight Time. The FBI conducted physical surveillance of KRAMER from July 16 to 17, 2026. During this time, the FBI observed KRAMER being driven to and arriving at his place of employment at approximately 09:41 PM. At approximately 06:31 AM the next day, the FBI observed KRAMER being driven home from his

place of employment. “Hamza Al Rashid’s” statement regarding his availability to speak is consistent with KRAMER’s overnight work schedule.

58. On or about July 4, 2026, “Hamza Al Rashid” informed the FBI CHS of his attack plan against a crowd, which included throwing “smoke and pepper grenades to blind them.” Amazon records show that on May 18, 2026, KRAMER purchased “SABRE Pepper Spray,” which was shipped to his home address. “Hamza Al Rashid’s” statement about utilizing “pepper grenades” is consistent with KRAMER’s online purchase of pepper spray.

59. On or about July 6, 2026, “Hamza Al Rashid” informed the FBI CHS that his mother and father were not available to teach “Hamza Al Rashid” how to drive. “Hamza Al Rashid” also stated that his parents were “not fond of me” and “does not like me” because “of Islam.” On or about July 18, 2026, “Hamza Al Rashid” informed the FBI CHS that “someone takes” him to work. As detailed above, the FBI conducted physical surveillance of KRAMER between July 16 and 17, 2026. As stated above, the FBI observed KRAMER being driven to and arriving at his place of employment at approximately 9:41 PM, and he was driving home at approximately 06:31 AM the following morning. I believe “Hamza Al Rashid’s” statements about being driven to his place of employment, coupled with the FBI’s observation of KRAMER being driven to his place of employment, are consistent with KRAMER being the user of “Hamza Al Rashid.”

60. On June 2, 2026, “Hamza Al Rashid” commented to a messaging platform, “please share this brothers with anyone you may know who can assist in our operations. this is the most secure messenger available. avoid telegram, matrix, threema, and briar.” On or about July 14, 2026, KRAMER, user of Reddit Account “u/i_love_femboys6969” commented, “signal sucks. simplex is where its at.” The similar guidance over a relatively short span of time to use SimpleX as a means of secure communication is consistent with KRAMER being the user of “Hamza Al Rashid.”

KRAMER's Recent Attempts to Purchase a Firearm from Third Parties

61. On July 20, 2026, I reviewed the results of legal process from financial services provider Chime regarding KRAMER's account activity. Chime's records for KRAMER's account showed that on May 14, 2026, KRAMER used his Chime account for a \$6.99 purchase to "Armslist." I conducted an internet search for "Armslist" and identified the U.S. company, Armslist LLC ("Armslist").

62. Based upon my training and experience and my review of Armslist's website, I know that Armslist is a classifieds-style advertisement website with sections devoted to firearms, firearms accessories, outdoor equipment, miscellaneous firearms related materials, and discussion forums. Armslist provides a venue for individuals to buy and sell firearms privately, without a background check. Additionally, I know that Armslist users must subscribe to communicate with others to negotiate the sale of firearms on the Armslist platform.

63. On August 31, 2026, I reviewed the results of legal process from Armslist, which requested Armslist's records associated with the KRAMER's known telephone number and KRAMER's email address, `persistedsphinx@gmail.com`. Armslist's records showed that the KRAMER's known telephone number and the e-mail address `persistedsphinx@gmail.com` were used to create an Armslist account on May 12, 2026. According to Armslist's records, the username of this account is "PersistedEgypt."

64. According to Armslist's records for KRAMER's account, from May 12, 2026, through May 21, 2026, KRAMER initiated contact with seven (7) individuals to purchase firearms. I reviewed the "Message History" between KRAMER and the seven other individuals.

65. Generally, KRAMER ceased communication with individuals if they wished to conduct the firearm sale and transfer through an otherwise reputable gun store that possessed a

Federal Firearm License¹¹ to legally sell firearms. KRAMER's messages with these individuals showed KRAMER's preference to conduct the sale privately and with cash.

66. For instance, on May 13, 2026, Armslist's records of KRAMER's messaging history showed that KRAMER initiated contact with a partially identified individual (Armslist User 1) to purchase an unspecified rifle. KRAMER stated, "im interested in possibly purchasing this rifle in about a week and a half, do you have any criteria for purchase other than typical state/federal laws?" Armslist User 1 responded, "Cant hold it but if its there I usually want to see a concealed carry permit," before asking where KRAMER was located. KRAMER responded that he's "about 40 miles out" and "it would be my first time purchasing a firearm so as of now i don't have a concealed carry." Armslist User 1 responded, "Well I would need to do a transfer at an ffl." KRAMER then messaged, "i thought this was a private sale? oh well, if not then i guess you can forget about my interest."

67. Between May 20, 2026, and May 21, 2026, KRAMER initiated and sustained communication with another fully identified individual (Armslist User 2) to purchase an "F17 17WSM."¹² In that conversation, KRAMER revealed that he lived "about 30-40 miles from Pittsburgh" and that he was reliant on others for transportation. On September 2, 2026, the FBI conducted an in-person interview of Armslist User 2. Armslist User 2 confirmed they never sold a firearm to Armslist User "PersistedEgypt."

¹¹ A Federal Firearm License, or FFL, is an official permit from the Bureau of Alcohol, Tobacco, and Firearms ("ATF") that allows a person or business to legally sell, make, or import firearms and/or ammunition.

¹² Based upon my training and experience, I know "F17 17WSM" is a likely reference to a Franklin Armory F17 piston-driven .17 caliber Winchester Super Magnum (WSM) rimfire cartridge. The .17 caliber WSM rimfire cartridge was reported in open source as the fastest and most powerful rimfire cartridge available, achieving muzzle velocities up to 3,300 feet per second (fps).

KRAMER's Activity on September 12, 2026

68. At approximately 10:04 am on September 12, 2026, FBI agents observed KRAMER quickly depart his residence while carrying a backpack. The agents then observed KRAMER enter a white SUV, which was driven by an Uber driver. When KRAMER departed the area, his father exited the residence, briefly looked around, and returned to the residence. Thereafter, KRAMER's sister exited the residence, briefly looked around, and returned to the residence.

69. Based upon KRAMER's online activity, his Amazon purchases, and his quick departure from the residence, the FBI requested that the Adams Township Police Department conduct a welfare check of the residence. Although FBI agents did not observe KRAMER's father and sister depart the residence prior to the arrival of local law enforcement, no one answered the door when officers announced their presence at the residence.

70. In response to legal process, I learned that KRAMER took the Uber after departing the residence to a Walmart located in Gibsonia, Pennsylvania, in the Western District of Pennsylvania. As a result, the FBI traveled to this Walmart location and spoke with an employee. According to the employee, KRAMER requested that the employee watch his bag as he shopped. KRAMER then placed the bag on the counter, and the employee informed the FBI that they heard a metallic clunk when KRAMER did so. While at Walmart, KRAMER purchased a disposable cellular phone and minutes to use the phone. Although law enforcement had an emergency ping on KRAMER's known cellular phone through Verizon Wireless, the phone was no longer responding to the Verizon Network. Based upon my training and experience, I know that individuals who are engaged in criminal activity will sometimes turn off their cellular phones and use disposal "burner" phones in order to mask their physical movements from authorities. Due to

KRAMER's quick departure from the residence, the purchase of a disposable phone, and the lack of communication between the Verizon network and KRAMER's known telephone number, I believe that KRAMER deactivated his phone in order to mask his movements.

71. While at Walmart, the FBI observed closed circuit television (CCTV) of KRAMER in the Walmart parking lot after departing the store. The footage depicted KRAMER meeting with an individual in the parking lot. Although the footage is grainy, the FBI agent observed KRAMER obtain something from the trunk of the individual's vehicle while in the Walmart parking lot. The object that KRAMER received, based on my training and experience, and knowing KRAMER's previous attempts to purchase a firearm through a private seller, appeared to be a long black bag that could have accommodated a rifle.

72. Thereafter, Uber confirmed that KRAMER departed Walmart in an Uber vehicle and traveled to the Cranberry Park Hotel, which is located at 2009 US-19, Cranberry Township, PA 15106. Based upon this information, the FBI traveled to the hotel and met with an employee at the check-in counter. The employee confirmed that Jonathan Hunter Kramer checked in to Room 213 and paid \$450 cash to stay in the hotel for one week. Based upon training and experience, I know that individuals who are engaged in criminal activity will often pay cash in an effort to mask their activities. Due to KRAMER's online activity, purchase of a disposable phone, and the deactivation of his known cellular phone number, I believe that KRAMER paid cash to rent the hotel in an effort to mask his movements while engaged in criminal activity.

73. While speaking with the hotel employee, the FBI encountered another guest of the hotel in the lobby. The guest explained to the FBI that the individual who checked in (KRAMER), placed his bag down during check in. The guest explained that the guest used to work as a range safety officer at a shooting range. Further, the guest recounted that the sound of firearm magazines

contacting each other creates a distinct metallic sound. The guest opined that the metallic sound caused by KRAMER when placing his bag on the ground was consistent with firearm magazines contacting each other.

74. After KRAMER checked in to the hotel and deposited his bags within the hotel room, he traveled to Dunham's Sports within the Western District of Pennsylvania. FBI agents observed KRAMER within the Dunham's Sports at the firearm counter. When KRAMER returned to the hotel's parking lot, FBI agents approached KRAMER and requested to speak with him voluntarily. KRAMER agreed to do so and placed two bags on the ground.

75. Thereafter, on September 12, 2026, the FBI executed federal search warrants upon KRAMER's person and his hotel room. From within the bags KRAMER carried from Dunham's Sports through the parking lot of the hotel, law enforcement seized three (3) 30-round capacity rifle magazines and five (5) boxes of 5.56 caliber ammunition, which contained a total of 130-rounds. From KRAMER's hotel room, authorities seized a Defense Procurement Manufacturing Services (DPMS) Panther Arms semiautomatic rifle, two (2) loaded rifle magazines, a rifle bipod, a rifle scope, an entrenchment tool, a prayer rug, pepper spray, and a cellular telephone within two Faraday bags.¹³ The seized firearm was contained within a duffle bag, which appeared to be very similar to the bag KRAMER received in the parking lot of Walmart earlier that day.

76. Before law enforcement executed the search warrant for KRAMER's person, KRAMER repeatedly told agents that he was "fucked."

77. On September 12, 2026, the FBI also executed a federal search warrant of KRAMER's residence. From KRAMER's room, the FBI seized approximately 30 knives and an undated note that read: "DoNt look For me[.] IDK what I did buT I cant live In constant Fear[.]"

¹³ Based upon my training and experience, I know that a Faraday bag is a portable pouch that protects electronic devices from sending or receiving signals while sealed within the Faraday bag.

78. Based upon my training, experience, and investigation to date, KRAMER's conduct on September 12, 2026, is consistent with an individual seeking to obfuscate his location as part of illicit activity. Such conduct includes quickly departing his residence with a bag, taking an Uber to Walmart, purchasing a disposal phone, retrieving an item from an individual at the Walmart parking lot, taking an Uber to a hotel, paying cash, and utilizing a Faraday bag. Further, the seizure within KRAMER's hotel room of a semiautomatic rifle from a bag bearing very similar characteristics to the bag he acquired in the parking lot of the Walmart supports that KRAMER received the firearm on September 12, 2026. Additionally, after receiving that firearm, KRAMER traveled to Dunham's Sports and purchased five (5) boxes of 5.56 caliber ammunition, which could be fired from the firearm he received earlier that day.

79. Based upon KRAMER's online conduct, to include communication with an FBI CHS about planning a violent attack in support of ISIS, his prior pledge of allegiance to ISIS, as well as his activity on September 12, 2026, where he took possession of a rifle and approximately 190 rounds of ammunition and attempted to obfuscate his location, probable cause supports that KRAMER knowingly received a firearm and ammunition on September 12, 2026, knowing or having reasonable cause to believe that the firearm and ammunition would be used to commit a felony or a Federal crime of terrorism.

V. CONCLUSION

80. Based upon the facts and information set forth in this Affidavit, I respectfully submit that there is probable cause to believe that KRAMER violated Title 18, United States Code, Section 924(h) on September 12, 2026.

The above information is true and correct to the best of my knowledge, information, and belief.

s/Gregory Battaglia
GREGORY BATTAGLIA
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to me by telephone,
pursuant to Fed. R. Crim. P. 4.1(b)(2)(A),
this 13th day of September, 2026.

HONORABLE MAUREEN P. KELLY
United States Magistrate Judge
Western District of Pennsylvania