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b. CHS1 then asked Mahde if he (Mahde) truly understood what "we" have going on," and Mahde replied that he did. CHS1 asked Mahde if he (Mahde) knows where the guns are going, and Mahde replied yes. CHS1 asked Mahde who the guns were going to, and Mahde replied "us." CHS1 asked Mahde, "Who's us?" Mahde replied by stroking his beard.<sup>44</sup> Mahde then stated, "I don't want to say it out loud." CHS1 told Mahde that he (Mahde) knows who the ghost rifles are going to and Mahde can't mess around on this. Mahde indicated that he understood.

c. Mahde then said he wanted UCE1 to know that he (Mahde) would never throw anyone under the bus, that his brother (Moyad) is in this, and that he (Mahde) is in this. CHS1 says well people run their mouths. Mahde asked "what are they going to do, put me in jail, talk or you're going to jail?" Mahde then said there is a constitution to protect him, the government isn't going to go throw him (Mahde) in GITMO and water board him until he says something. Mahde also assured CHS1 that "they" have no hint of anything, that Mahde's phone is clear, and Mahde takes all precautions.

d. CHS1 told Mahde that money is not his motivation for being involved in the illegal gun deal, and CHS1 is not making any money off of the deal. Mahde refers to Moyad as "the chef" and himself as "the businessman." According to Mahde, Moyad told Mahde that the gun deals were all for a bigger cause, and that money was not the motivation. Mahde told CHS1 that Moyad would build the weapons for free, but Mahde won't do it for free. Toward the end of the conversation CHS1 told Mahde that he can't be doing anymore stupid stuff, and Mahde replied that he (Mahde) was not going to risk a quarter of a million dollars.<sup>45</sup> Mahde also told CHS1 that he wants "it" [meaning a successful/profitable gun building operation] more than CHS1 does.

153. On or around April 1, 2019, Moyad contacted the OCE and told the OCE that he (Moyad) concluded that the Arabian Peninsula or Jordan will be the areas closest to you (OCE). Moyad then told the OCE, "Let us put our trust in Allah and begin coordination from one of the two countries."<sup>46</sup>

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<sup>44</sup> During one of the previous gun builds, Mahde stroked his beard in a similar way when referring to "Muslim brothers."

<sup>45</sup> Under the terms of the deal that Moyad and UCE1 negotiated with CHS2 in Phoenix, Arizona, Moyad's and Mahde's cut from the sale of the fifty (50) fully-automatic rifles would be \$250,000. Mahde's knowledge of that amount confirms that Moyad shared the details of his trip to Arizona with Mahde.

<sup>46</sup> The FBI assesses these statements to mean that Moyad had done online research into the recent activities of ISIS-backed fighters and determined that the best way for Moyad to enter ISIS-controlled territory was through Jordan or

154. On or around April 5, 2019, the OCE and Moyad continued their discussion about Moyad's travel planning. Toward the end of the conversation, Moyad asked, "Now my brother, the important thing is which one of the two countries that I mentioned to you, [do] you advise to cross from?"

155. On or about April 7, 2019, the following exchanges between Moyad and the OCE then ensued:

a. Moyad asked for more details about his travel planning. The OCE then advised Moyad that the OCE will do what he is supposed to do and Moyad should do what he is supposed to do. Unsatisfied with that answer, Moyad persisted, stating, "Brother, give me more details . . . I will not trust anyone and talk to him. Because if I suspect anyone then Allah willing, I will cut his neck, I will slaughter him," or words to that effect.

b. The OCE told Moyad to slow down and asked "what is with you?" Moyad replied, saying "Forgive me, brother, I need a clear and complete picture to continue. Ticket is easy to obtain, Allah willing, I want more details, otherwise, forgive me brother, I will continue on my own and Allah will facilitate things for me."

156. On or around April 8, 2019, the OCE and Moyad continued their discussion about Moyad's travel planning.

157. Between on or around April 9 and on or around April 15, 2019, Moyad and the OCE continued to communicate, with Moyad actively seeking to further clarify and solidify the details of the previously-discussed travel arrangements.

158. On or about May 2, 2019, Moyad met with CHS2 in Cincinnati, Ohio, at a Starbucks and in CHS2's vehicle in the Starbucks parking lot. The following exchanges occurred during this meeting:

a. CHS2 and Moyad discussed Moyad's communications with OCE and Moyad's desire to travel to ISIS-controlled territory overseas via Turkey. Moyad stated that he would only make this travel if he could meet CHS2 in Turkey and have CHS2 introduce him personally to the individual who would then escort him (Moyad) to ISIS-controlled territory in Syria or Iraq. CHS2 advised Moyad that Moyad should go home

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the Arabian Peninsula.

and pray about the matter, and that if he still wanted to travel to ISIS-controlled territory after this, he should then contact OCE.

b. CHS2 and Moyad also discussed the five guns that Moyad would be building in accordance with the deal that was previously negotiated between Moyad and UCE1 and UCE2. CHS2 asked Moyad if he understood where these guns were going, and Moyad replied that he believed the weapons were going to "the State." CHS2 asked if by saying "the State" Moyad meant the Syrian Government. Moyad replied that he definitely did not mean the Syrian Government, but that he meant the Islamic State.

c. CHS2 advised Moyad that traveling overseas to join ISIS or building weapons for ISIS both constitute jihad for the sake of Allah, which is the mission statement of the Islamic State.

d. Moyad told CHS2 that his (Moyad's) family does not know about his plans to travel to ISIS-controlled territory, but that his father knows that he has been building firearms, though the father does not know where the firearms are going.

159. Other conversations and evidence collected during this investigation have corroborated that Moyad's father and/or mother are aware of Moyad's and Mahde's firearms-related purchases and activities. For example, records obtained from J.P. Morgan Chase reveal that a debit card associated with a joint checking account held by Moyad and Mohdkear was used to purchase firearms components, via the Internet, from Business E and Business F.<sup>47</sup> Those purchases began on or around August 15, 2018, and continued until on or around February 28, 2019. During this period there were approximately six (6) purchases from Business E and Business F that totaled approximately \$2566.00.<sup>48</sup>

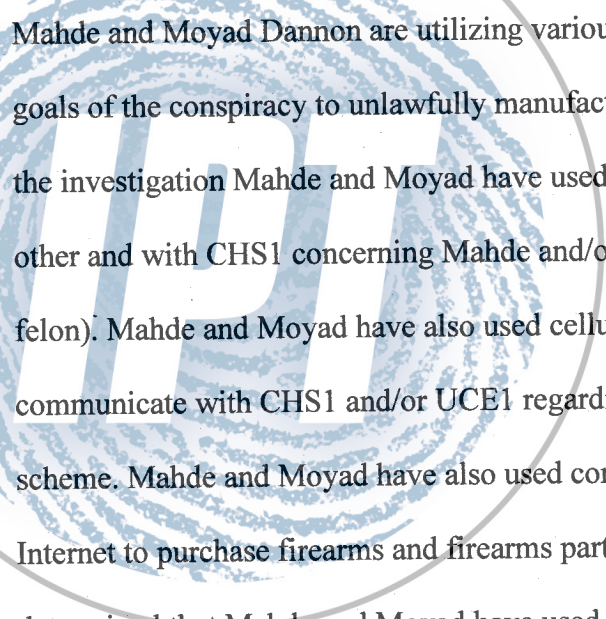
160. On the night of May 2, 2019, Moyad sent OCE a message in which Moyad expressed his desire to travel overseas to ISIS-controlled territory. Moyad asked OCE to coordinate details with CHS2 in order to assist Moyad with this travel.

161. Throughout this investigation the FBI has developed considerable evidence that

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<sup>47</sup> Business E and Business F are both headquartered outside of the Southern District of Indiana.

<sup>48</sup> The FBI assesses that the firearms components that were purchased through this joint checking account were used in the ghost guns that were built by Moyad and Mahde.

The FBI seal is visible in the background, featuring a circular design with the words "FEDERAL BUREAU OF INVESTIGATION" and "DEPARTMENT OF JUSTICE" around the perimeter, and a central shield with a scale of justice and a sword.

Mahde and Moyad Dannon are utilizing various electronic devices and the Internet to further the goals of the conspiracy to unlawfully manufacture firearms. For example, during the course of the investigation Mahde and Moyad have used cellular telephones to communicate with each other and with CHS1 concerning Mahde and/or Moyad providing firearms to CHS1 (a convicted felon). Mahde and Moyad have also used cellular telephones and messaging applications to communicate with CHS1 and/or UCE1 regarding the brothers' illegal gun manufacturing scheme. Mahde and Moyad have also used computers and/or other electronic devices and the Internet to purchase firearms and firearms parts. Finally, based on its investigation, the FBI has determined that Mahde and Moyad have used computers and/or other electronic devices, as well as the IP addresses associated with the residence located at 10683 Summerwood Lane, Fishers, Indiana, to facilitate and perpetrate numerous violations of federal law, including the **Target Offenses** discussed above.

162. During the course of the investigation outlined above, the FBI has also determined that Mahde and Moyad have used a number of motor vehicles to facilitate the commission of the **Target Offenses**. The use of such motor vehicles has included transporting co-conspirators to meetings and activities related to the unlawful gun manufacturing scheme and/or transporting illegally- purchased and stolen firearms to meetings where those firearms were unlawfully transferred to a prohibited person.

#### Conclusion

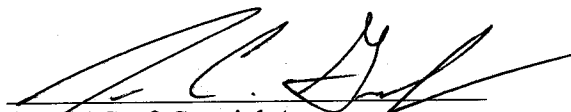
217. Based on the foregoing facts, I submit that probable cause exists to believe that the **Mahde Dannon and Moyad Dannon** have committed numerous violations of federal law, including violations of Title 18, United States Code Sections 922(a)(1)(A), 922(d), 922(j), 922(n), 2314, and 371, as well as violations of Title 26, United States Code, Section 5861. I

therefore request this Court issue warrants for Mahde and Moyad Dannon, authorizing their arrest.

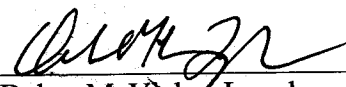
**SEALING ORDER REQUESTED**

218. IT IS FURTHER REQUESTED that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit, criminal complaint, and warrants. I believe that sealing this document is necessary because the warrant is relevant to an ongoing investigation. Premature disclosure of the contents of this Affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize future investigative steps that are contemplated in this investigation.

FURTHER YOUR AFFIANT SAITH NOT

  
Jon C. Graf, Special Agent  
Federal Bureau of Investigation

Sworn to before me this 15<sup>th</sup> day of May, 2019.

  
Hon. Debra McVicker Lynch  
United States Magistrate Judge  
Southern District of Indiana