

2025R00893/SM

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Leda D. Wettre, U.S.M.J.
 :
 v. : Mag. No. 26-13109
 :
 MOHAMAD SAGHA : **CRIMINAL COMPLAINT**
 :

I, Matthew Welter, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Matthew Welter
Matthew Welter, Special Agent
Federal Bureau of Investigation

Special Agent Welter attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 8th day of June, 2026.

/s/ Leda D. Wettre
Hon. Leda D. Wettre
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

**(Attempting to Provide Material Support and Resources
to a Designated Foreign Terrorist Organization)**

From in or around December 2025 through in or around June 2026, in Passaic County, the District of New Jersey and elsewhere, the defendant,

MOHAMED SAGHA,

knowingly attempted to provide “material support or resources,” as that term is defined by Title 18, United States Code, Section 2339A(b)(1), namely, property, tangible or intangible, and services, including communications equipment and procurement services, to wit: purchasing and providing a subscription to a Virtual Private Network to enable secure communications, to a foreign terrorist organization, namely the Islamic State of Iraq and al Sham, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism.

In violation of Title 18, United States Code, Section 2339B(a)(1).

ATTACHMENT B

I, Matthew Welter, am a Special Agent of the Federal Bureau of Investigation (“FBI”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including:

(a) statements made or reported by various witnesses with knowledge of relevant facts, including other FBI agents and/or law enforcement officers; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance, business records, and other documents. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

BACKGROUND ON THE ISLAMIC STATE OF IRAQ AND AL-SHAM (ISIS)

1. Under 18 U.S.C. § 2339B (Providing or Attempting or Conspiring to Provide Material Support or Resources to Designated Foreign Terrorist Organizations), it is a crime to knowingly provide, or attempt or conspire to provide, material support or resources to a foreign terrorist organization. The term “terrorist organization,” as defined in 18 U.S.C. § 2339B(g)(6), means an organization that is designated as such under section 219 of the Immigration and Nationality Act (the “INA”). In accordance with the INA, the Secretary of State designates certain foreign organizations as Foreign Terrorist Organizations (“FTOs”) based on their involvement in terrorist activity or terrorism as defined by statute.

2. “Material support or resources,” pursuant to 18 U.S.C. § 2339A(b)(1), is defined as “any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safe-houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (one or more individuals who may be or include oneself), and transportation, except medicine or religious materials.”

3. On or about October 15, 2004, the U.S. Secretary of State (“Secretary”) designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist (“SDGT”) under section 1(b) of Executive Order 13224. On or about May

15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist 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 (i.e., “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.

4. On or about September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On or about 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.

SUMMARY OF PROBABLE CAUSE

5. Between at least in or around December 2025 through the present, defendant Mohamed Sagha (“SAGHA”) participated in one or more chat groups on an online social media platform that allows communication through voice calls, video calls, text messaging, and media (the “Platform”) wherein ISIS supporters discussed, among other things, potential attacks on targets within the United States, including places of worship.

6. Beginning in or around October 2025, and continuing through in or around June 1, 2026, a confidential human source (“CHS-1”)¹ communicated with SAGHA through the Platform. SAGHA told CHS-1, in sum and substance, that SAGHA had become familiar with ISIS and its doctrine through reading about ISIS online. SAGHA believed that he was living in “*dar al-harb*”² and wished to establish

¹ CHS-1 is known to the FBI and has a history of providing credible and reliable information. CHS-1 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-1 cited herein has been verified by the FBI to the extent possible. CHS-1 has no known criminal history.

² *Dar al-Harb* is Arabic for “House of War” or “Abode of War.” Based on my training and experience, and information known to me, I understand the term is an expression used by extremists to refer to countries and/or territories where Islamic law is not implemented and where Muslims are perceived to be unable to practice their religion freely. It is often used interchangeably with *Dar ol-Kuffar*, meaning the “House of Infidels” or “Abode of Infidels.”

his “*niya*,”³ which CHS-1 understood as SAGHA’s intention to engage in an act of violent extremism or “*jihad*.”⁴

7. During his communications with CHS-1, SAGHA expressed an intent to assist one of the members of an ISIS-supporters chat group on the Platform with an attack on a place of worship. SAGHA also was contemplating carrying out an attack of his own, possibly on a National Guard location or on a Jewish place of worship, with SAGHA sharing photographs and/or videos of both locations and stating they were near SAGHA’s place of residence in Wayne, New Jersey.

8. Throughout his communications with SAGHA, CHS-1 repeatedly held himself out as an ISIS member. For example, between on or about January 23, 2026, and on or about January 24, 2026, CHS-1 sent a message to SAGHA stating “I reached my destination.” Based on my training and experience, and my knowledge of the investigation, CHS-1 was telling SAGHA that CHS-1 had reached ISIS territory in Syria. CHS-1 also sent SAGHA a photograph that depicted CHS-1 in a truck holding an ISIS flag with instructions for SAGHA to delete the photo.

9. In or around January 2026, CHS-1 learned that SAGHA was planning to leave New Jersey for Canada and thereafter make his way either to Syria or Nigeria. According to CHS-1, SAGHA’s intention was to make *hijrah*⁵ and to engage in *jihad*.

10. In or around February 2026, the FBI learned that SAGHA planned to travel to Canada to meet up with another purported ISIS supporter whom SAGHA met on the Platform (“Individual-1”). In their discussion on the Platform, SAGHA

³ “*Niya*” is Arabic for “intention.” Based on my training and experience, and information known to me, the term is a word used to express one’s true intentions and/or sincere belief.

⁴ “*Jihad*” is Arabic for “striving” or “struggling.” Based on my training and experience, and information known to me, I understand Islamic extremists, such as ISIS and its supporters, use the word “*jihad*” to refer to use of violence, including paramilitary action, against persons and/or governments deemed by the extremist group to be enemies of their fundamentalist version of Islam.

⁵ The term “*hijrah*” or “*hijra*”—Arabic for “departure” or “migration”—was the journey of the Islamic prophet Muhammad and his followers from Mecca to Medina. Based on my training and experience, when used by ISIS supporters, the term *hijra* describes the travel from one’s home country to ISIS-held territories for the purpose of joining the group.

and Individual-1 discussed, among other things, meeting in Canada and subsequently travelling to Syria to be in ISIS territory.

11. On or about February 25, 2026, CHS-1 and SAGHA participated in a voice call on the Platform with one or more other individuals wherein they discussed, among other things, SAGHA's plan to travel to Canada. SAGHA stated, in sum and substance, that the plan was to meet Individual-1 in Canada and then to travel onward with Individual-1 to Syria. SAGHA also stated, in sum and substance, that he had discussed with Individual-1 the fact that SAGHA had a contact in Syria. From context, this appears to be a reference to CHS-1.

12. On or about March 2, 2026, CHS-1 communicated with SAGHA over the Platform and asked SAGHA to "renew" his *bay'a* to ISIS. The term *bay'a* is Arabic for "pledge" or "oath." Based on my training and experience, ISIS members and/or supporters are expected to perform a *bay'a* as a means of declaring their allegiance to ISIS and the group's so-called Caliph, or leader. Although there is no evidence that SAGHA performed a *bay'a* following this conversation, based on my training and experience and my knowledge of the investigation, it appears that SAGHA had previously pledged *bay'a* to ISIS and that CHS-1 was suggesting that SAGHA renew his pledge. In the same conversation, CHS-1 also stated to SAGHA that CHS-1 was not the "*emir*" or leader of the particular ISIS group to which CHS-1 belonged.

13. Between on or about March 2, 2026, and March 4, 2026, CHS-1 sent SAGHA another photo that depicted CHS-1 as an ISIS fighter. Specifically, the man in the photo purporting to be CHS-1 was wearing a cream tunic, a red-and-white turban, and a black face covering. He was sitting on a rug on the ground, leaning against a vehicle over which the ISIS flag was draped, holding what appeared to be an AK-47-style assault rifle. CHS-1 also sent a direct message to SAGHA stating, in sum and substance, that "the other *ikwah*⁶ [are] behind the mountains." Based on my training and experience and my knowledge of the investigation, I believe CHS-1 was telling SAGHA that CHS-1 was part of an armed ISIS group.

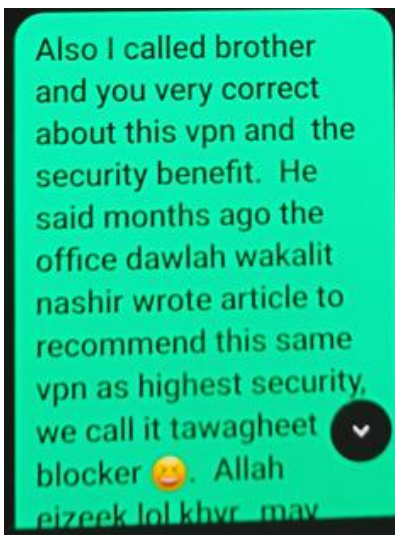
14. On or about March 9, 2026, SAGHA left his residence in Wayne, New Jersey, with plans to travel to Canada as outlined above. However, SAGHA was unable to put his plan into action and eventually returned home.

⁶ This appears to be a misspelled form of the word *ikhwan* meaning brothers.

15. On or about May 31, 2026, SAGHA and CHS-1 exchanged voice and/or text messages on the Platform. CHS-1 and SAGHA discussed a Virtual Private Network or “VPN” for CHS-1 and the “brothers.”

16. Based on my training and experience, VPN technology enables users to conceal their online activities, mask their locations and identities, and communicate with greater anonymity. In the hands of members of a foreign terrorist organization, such technology can assist efforts to evade detection, maintain communications, and further the organization’s activities.

17. CHS-1 told SAGHA that “the office of *dawlah*” had published an article recommending use of VPNs.



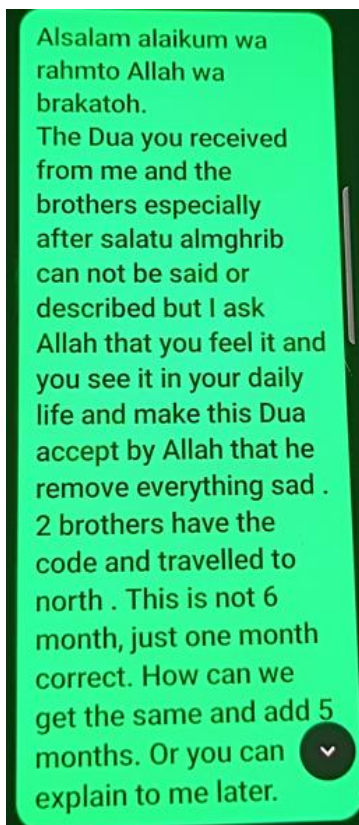
18. In my training and experience, ISIS members and supporters refer to one another as “brother.” Based on my knowledge of the investigation and the context of this conversation, I believe CHS-1 was using the word “brothers” as a shorthand for ISIS members. I also believe that by using the phrase “the office of *dawlah*,” CHS-1 was implying that CHS-1’s interest in using VPN for communication was driven in part by a recommendation from an official ISIS publication.⁷

19. In the same conversation, SAGHA offered to buy a VPN subscription for CHS-1 and the “brothers,” and the two discussed said purchase.

⁷ Based on my training and experience, and information known to me through this investigation, I understand the term “Dawlah” and “Dawla” to mean ISIS, which is the FTO at issue

20. SAGHA then purchased a VPN plan to be used by up to five “brothers.” Based on my knowledge of the investigation, SAGHA sent the purchased VPN to CHS-1.

21. CHS-1 then sent the following message to SAGHA on the Platform on the same date:⁸



22. Based on my training and experience and my knowledge of the investigation, I believe in this message, CHS-1 is acknowledging the receipt of the VPN and thanking SAGHA for sending it by stating, among other things, that CHS-1 and the other “brothers”—i.e., ISIS fighters—are praying for SAGHA as a means of showing their gratitude for the VPN.

23. On or about June 1, 2026, Sagha and CHS-1 again spoke on the Platform using voice and/or text messages and discussed the VPN that SAGHA had

⁸ The term *dua* is Arabic for “prayer” and the term *salatu al-maghrib* refers to the evening prayer. Based on my training and experience and my knowledge of the investigation, I believe CHS-1 was thanking SAGHA for sending the VPN to CHS-1 for the benefit of CHS-1 and other ISIS members.

purchased and sent to CHS-1. SAGHA provided CHS-1 with technical instruction concerning how to use the VPN.

24. Based on my training and experience, had SAGHA been communicating with an actual ISIS member and not a confidential source, he would have provided members of a terrorist organization with a tool capable of enhancing their operational security and ability to communicate and operate online with reduced risk of identification, thereby facilitating their planned acts of terrorism.