

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 26-MJ-569

CATHERINE BETH WASHBURN

Defendant

CRIMINAL COMPLAINT

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

Between on or about February 15, 2025, and the date of this complaint, in the County of Monroe, in the Western District of New York, and elsewhere, the defendant, **CATHERINE BETH WASHBURN**, a national of the United States, did knowingly attempt to provide material support and resources, namely, currency, to a designated foreign terrorist organization, namely, Palestine Islamic Jihad a/k/a Al Quds Brigades (PIJ), knowing that PIJ was a designated foreign terrorist organization, and that PIJ had engaged in and was engaging in terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).

This Criminal Complaint is based on these facts:

Continued on the attached sheet.


Complainant's signature

TIMOTHY J. KLAPEC
Special Agent
Federal Bureau of Investigation

Printed name and title

Affidavit and Criminal Complaint submitted electronically by e-mail in .pdf format. Oath administered, and contents and signature attested to me as true and accurate telephonically pursuant to Fed.R.Crim.P. 4.1 and 41(d)(3):

Date: June 29, 2026

City and State: Rochester, New York


Judge's signature

HON. MARK W. PEDERSEN
United States Magistrate Judge
Western District of New York

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) SS:
CITY OF ROCHESTER)

I, TIMOTHY J. KLAPEC, being duly sworn, do hereby state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since November 2004. I am currently assigned to the Joint Terrorism Task Force (“JTTF”), Buffalo Division, in Rochester, New York. At the JTTF, I work with a team of federal, state, and local law enforcement agents and officers on investigations relating to domestic terrorism, international terrorism, weapons of mass destruction, and individuals posing a risk of engaging in acts of targeted violence. As a result of my training and experience, I am familiar with tactics, methods, and techniques used by terrorist organizations and their members, by individuals seeking to join or engage in acts on behalf of terrorist organizations, and by individuals acting on their own to plan and execute acts of violence on the community. I have also conferred with other FBI Special Agents who have expertise and experience in counterterrorism investigations and digital evidence. In addition, I have participated in the execution of search warrants involving electronic evidence relating to those investigations, including electronic devices, electronic communications accounts and online storage services. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, unless noted otherwise.

2. This affidavit is submitted for the limited purpose of establishing probable cause to support a criminal complaint charging **CATHERINE BETH WASHBURN** with knowingly

attempting to provide material support and resources, namely, currency, to a designated foreign terrorist organization, namely, Palestine Islamic Jihad (a/k/a Al Quds Brigades) (PIJ), in violation of Title 18, United States Code, Section 2339B(a)(1). This affidavit does not include each and every fact known to me concerning this investigation. I have set forth facts that I believe are necessary to establish probable cause to believe that **WASHBURN** has committed the offense alleged in the complaint.

3. The information contained in this affidavit is based on, among other things, my personal participation in the investigation of **WASHBURN**, information conveyed to me by other law enforcement agents, digital evidence recovered from **WASHBURN**'s iCloud account pursuant to federal search warrants, and subpoenaed financial records. The messages summarized in this affidavit were written in Arabic. The summaries of those messages are based on machine translations that have been reviewed for accuracy and edited by either a certified Arabic translator or an FBI Special Agent familiar with the Arabic language.

BACKGROUND AND APPLICABLE LAW

4. **WASHBURN** is a 37-year-old United States citizen and resident of Irondequoit, New York. She is one of the leaders of a group known as the "Direct Action Movement for Palestinian Liberation" ("DAMPL"). DAMPL is an extremist organization that was formed in the aftermath of the large-scale terrorist attack on Israel by Hamas on October 7, 2023. Based on public information, law enforcement records, and my training and experience, I know that DAMPL rejects the idea of peaceful protests and engages in "direct action" – including acts of sabotage and property destruction – in support of the Palestinian cause and against entities that it associates with Israel.

5. This investigation has revealed that **WASHBURN** has raised funds for and sent funds to a purported PIJ fighter in Gaza with the initials H.H.¹ Messages between **WASHBURN** and H.H. show that, since at least February 2025, **WASHBURN** has known that H.H. claims to be affiliated with the Al-Quds Brigades, which is PIJ's military wing, and that H.H. has claimed to be engaged in attacks against Israel Defense Forces ("IDF") in Gaza. Financial records show that, between approximately October 8, 2025, and April 6, 2026, **WASHBURN** made approximately 80 transfers of cryptocurrency totaling 30,116 USDC² to a Bybit³ account registered in the name of and used by H.H.

6. Title 18, United States Code, Section 2339B(a)(1), Providing Material Support to Designated Foreign Terrorist Organizations, provides, in pertinent part, that:

Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, shall be . . . imprisoned not more than 20 years . . . To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization . . . , that the organization has engaged or engages in terrorist activity . . . , or that the organization has engaged or engages in terrorism. . .

The term "material support or resources" is defined, in pertinent part, as "any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services . . ." 18 U.S.C. § 2339A(b)(1).

¹ The JTTF knows the full name and identity of this individual but is withholding the name to protect the integrity of an ongoing investigation.

² A "stablecoin" is a type of virtual currency whose value is pegged to a commodity's price, such as gold, or to a fiat currency, such as the U.S. dollar, or to a different virtual currency. USDC is a stablecoin pegged to the U.S. dollar. As a result, the USDC sent by **WASHBURN** to H.H. is the equivalent of \$30,116 USD.

³ Bybit is a cryptocurrency exchange where customers can trade cryptocurrencies or digital currencies for fiat currency or other digital currencies. It is based in the Republic of Seychelles.

PROBABLE CAUSE

Palestine Islamic Jihad

7. “The Palestine Islamic Jihad (PIJ) is a Sunni Islamist militant group that is committed to destroying Israel and establishing an Islamist Palestinian State.”⁴

PIJ was founded in 1979 as an offshoot of the Muslim Brotherhood in Egypt and is the second-largest militant group in the Gaza Strip and the West Bank after HAMAS. PIJ has drawn inspiration from the Iranian Revolution and receives support from Iran and Lebanese Hizballah.

PIJ’s military wing, al-Quds Brigades, has been responsible for many attacks on Israeli targets since the 1990s. PIJ sometimes operates in coordination with HAMAS, including in the HAMAS-led surprise attack against Israel that killed nearly 1,200 people on 7 October 2023. In the ensuing conflict between Israel and HAMAS, Israeli operations partially degraded PIJ. Historically, PIJ has occasionally disagreed with HAMAS’s strategy for confronting Israel and tends to be more willing to act militarily, which has led to tensions.⁵

8. PIJ operates in Israel, the Gaza Strip, and the West Bank.⁶ It is estimated that PIJ has approximately 4,000 fighters.⁷ “PIJ primarily conducts small-arms, mortar, and rocket attacks from the Gaza Strip against Israeli targets in Israel and the West Bank.”⁸

9. On October 8, 1997, the United States Secretary of State designated Palestine Islamic Jihad-Shaqaqi Faction (“PIJ”) as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act. On January 23, 1995, the Department of the Treasury also designated PIJ as a Specially Designated Terrorist under Executive Order

⁴ https://www.dni.gov/nctc/terrorist_groups/pij.html (last visited on June 15, 2026).

⁵ *Id.*

⁶ *Id.* See also *U.S. Department of State 2023 Country Reports on Terrorism* (<https://www.state.gov/reports/country-reports-on-terrorism-2023>) (last visited March 16, 2026).

⁷ https://www.dni.gov/nctc/terrorist_groups/pij.html (last visited on June 15, 2026).

⁸ *Id.*

12947. The Secretary of State has also listed the following aliases for PIJ: PIJ-Shaqaqi Faction, PIJ, Islamic Jihad in Palestine, Abu Ghunaym Squad of the Hizballah Bayt Al-Maqdis, Al-Quds Squads, Al-Quds Brigades, Saraya Al-Quds, Al-Awdah Brigades.

Washburn’s Knowledge of H.H.’s Purported Affiliation with PIJ

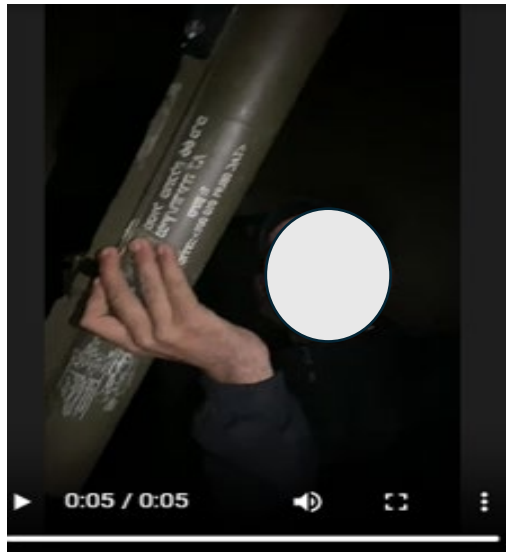
10. In February 2026 and March 2026, the JTTF obtained federal search warrants authorizing agents to search the contents of an Apple, Inc. iCloud account registered to and used by **CATHERINE WASHBURN**. During those searches, the JTTF recovered numerous WhatsApp messages between **WASHBURN** and H.H. showing that H.H. is a purported affiliate of PIJ and has engaged in attacks with PIJ against Israel. A summary of those messages is set forth below.

11. In a series of WhatsApp messages on February 15, 2025, **WASHBURN** and H.H. discussed, among other things, H.H.’s involvement with the PIJ/Al-Quds Brigades.

a. **WASHBURN** stated, “[i]f I lived in Gaza, I would fight alongside the resistance.” H.H. then stated, “Catherine, I am a fighter in the Islamic Jihad Movement [PIJ], but I did not participate in the fighting during the war.” **WASHBURN** then asked H.H. whether he “participate[d] on October 7th,” which was a reference to the large-scale terrorist attack against Israel by Hamas on October 7, 2023. H.H. responded, “[y]es my older brother and I.” After **WASHBURN** expressed her thanks, H.H. explained that they obtained military equipment from the Israeli army at the Erez Crossing near Beit Hanoun.⁹ **WASHBURN** asked whether the Israelis gave H.H. the equipment and he responded, “[n]o. We obtained it after

⁹ The Erez Crossing is a border crossing between Israel and Gaza and is located in the northernmost region of the Gaza Strip.

attacking and killing them.” **WASHBURN** replied, “[o]h yes, good job.” H.H. described treating his “brother”¹⁰ who was injured during the attack and then leaving northern Gaza for southern Gaza. **WASHBURN** praised H.H.’s bravery and stated, “I wish every day were October 7th.” H.H. shared a short video of himself holding an M72 Light Anti-tank Weapon (“LAW”) with Hebrew writing on the side of the weapon. Below is a still image¹¹ from the video, which depicts H.H. holding the LAW.



WASHBURN responded that she saw this video on H.H.’s Instagram account.

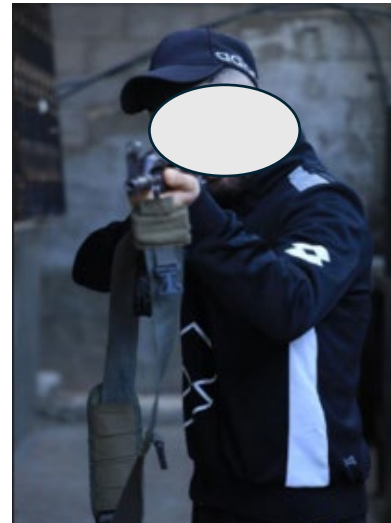
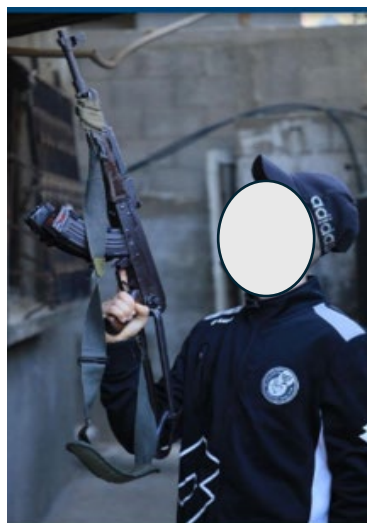
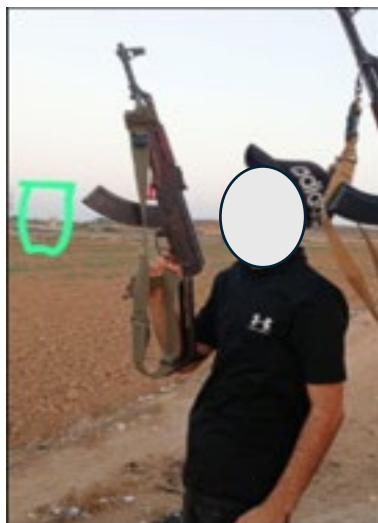
b. **WASHBURN** commented that H.H. was not the first fighter she had met. She then shared a photograph of two hand grenades in front of a Hamas flag. The photograph also depicted a cell phone propped up next to the hand grenades with **WASHBURN** on the screen holding a cell phone, as if she were conducting a video call.

¹⁰ It is unclear whether H.H. was referring to a brother who is a biological relative, a brother in arms, or a brother in the religion of Islam.

¹¹ I have obscured the face of H.H. in this image, and in the other images contained in this affidavit, to protect the integrity of an ongoing investigation.



In response, H.H. laughed and said, “ Hamas . . . I am not Hamas; we are Islamic Jihad – the Al-Quds Brigades,” which is PIJ’s military wing. H.H. then shared photographs of himself holding an AK-style rifle:



WASHBURN asked H.H. whether he was able to obtain a “T4 rifle,” which is believed to be a reference to a Taurus T4 assault rifle. H.H. responded, “[n]o, we only obtained bombs and bullets and M16,” which I believe is a reference to an M16 rifle.

c. H.H. stated that he joined the training program of the Islamic Jihad Movement (PIJ) when he was 17 ½ years old. During the training, H.H. broke his hand but was able to graduate into the “elite ranks” and become a member of “the anti-armor forces.” H.H. described how he used social media to deceive others regarding his affiliation with PIJ stating, “[i]n truth, I used social media to divert the army’s¹² attention away from me – to portray myself as a peaceful individual, rather than a resistance fighter.” H.H. acknowledged there were many videos of himself and his brother inside the “’48 territories¹³ - from the moment [they] were on the battlefield until [their] departure,” but they (H.H. and his “brother”) deleted those videos out of fear of being arrested at a checkpoint. **WASHBURN** responded, “I hate the Jews very much.”

d. H.H. then stated, “this was the first battle I have waged alongside the Islamic Jihad Movement—the Al-Quds Brigades,” and expressed his desire to continue with them if it were the will of Allah. **WASHBURN** responded, “I wish Israel would disappear,” “[e]very inch of Palestine must be returned,” and “[o]nly one state: Palestine.”

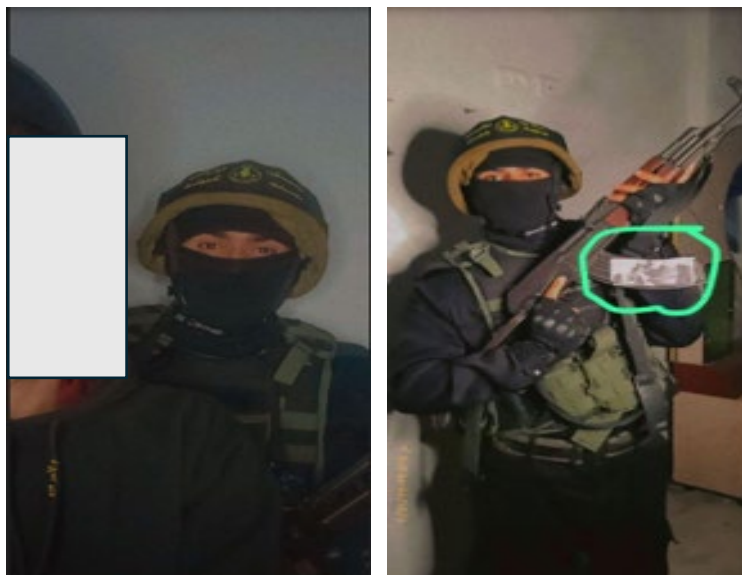
e. H.H. clarified his role on October 7, 2023, explaining that PIJ “called [him] up on October 7th, and then they told [him] not to fight” because his father had no brothers. “They” (PIJ) wanted H.H. “to stop fighting alongside the army—so that [he] would not fall as a martyr¹⁴ and [his] father be left all alone.” H.H. stated, “These are our distinctive uniforms

¹² Based on the context of this statement, and my training and experience, I believe that H.H. was referring to the Israeli military or intelligence services when he referred to “the army.”

¹³ The ‘48 Territories refer to the areas within the borders of Israel established after the 1948 Arab-Israeli War.

¹⁴ Based on my training and experience, I know that individuals involved in Islamic terrorism often use the term “martyr” to refer to being killed in combat.

– we, the Al-Quds Brigades Army.” There was no photograph associated with the statement, but I believe that H.H. was referring to photograph(s) he previously sent to **WASHBURN**, which included the following:



WASHBURN responded, “Gaza Ninja.”

f. **WASHBURN** then asked, “[d]o you really trust me to this extent?” H.H. responded, “[y]es.” After **WASHBURN** asked why he trusted her, H.H. responded, “[b]ecause I have spoken to you so much, I am not surprised by your speaking to me . . . Everything is normal between you and me.” **WASHBURN** replied, “[y]es, but this is something very private that you are sharing . . . I am proud.” H.H. then stated, “I shared it with you because I trust you, Catherine.” **WASHBURN** responded, “[y]ou can trust me—I swear it . . . I would have fought alongside you,” noting that she “can aim well” (which is believed to be a reference to aiming a firearm). H.H. responded, “Catherine, you really were fighting alongside me, my love,” and then said, “[y]our assistance to us here in Gaza is

fighting in the path of Allah.” **WASHBURN** then stated, “Allah willing. This battle is a sacred battle.”

12. In a WhatsApp conversation on March 19, 2025, **WASHBURN** expressed gratitude that H.H. had left the North. H.H. said the war was worse than before and, “[w]e, the Al-Quds Brigades – the military wing of Islamic Jihad – are not prepared to fight again.” H.H. explained that the resistance fighters were unable to enter the tunnels due to the bombardment and airstrikes.

13. A review of the WhatsApp messages between **WASHBURN** and H.H. reveals that they often communicate cryptically. They appear to consistently use black heart emojis when discussing terrorist activities and use the term “work” when referring to fighting or combat. A WhatsApp conversation on March 2, 2025, illustrates this practice. When H.H. shared that he would return to the North the next day, **WASHBURN** questioned why. H.H. responded with the following:

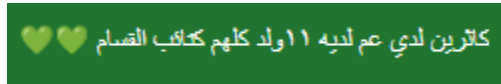


This Arabic message translates to, “[w]e are ready to work,” followed by the black heart emojis. **WASHBURN** then replied, “[m]ay God protect you and send his angels to fight alongside you.”

14. In a WhatsApp conversation on March 18, 2025, H.H. stated, “[o]ur leader has been martyred,” followed by black heart emojis and a reference to Abu Hamza.¹⁵ H.H. further

¹⁵ Abu Hamza was a spokesperson for the Al-Quds Brigades. Multiple Al-Quds Brigades spokespersons were killed by the IDF, and the successor spokespersons adopted the same Abu Hamza nom de guerre of their predecessors. Public information shows that Naji Abu Saif, a spokesman for the Al-Quds Brigades who was known as Abu Hamza, was killed in an Israeli airstrike in central Gaza on March 18, 2025.

explained that he had a family connection to Abu Hamza through marriage, and then sent the following message which incorporated green hearts at the end (as Arabic is read from right to left):



This message translated to, “Catherine, I have an uncle who has eleven sons – all of them are in the Al-Qassam Brigades”¹⁶ (followed by two green hearts). H.H. followed with the message below which incorporated both green heart and black heart emojis:



This message translated to, “[t]hank God, half of my family is fair-skinned [green heart emoji inserted] and the other half is dark-skinned [black heart emoji inserted].” **WASHBURN** responded, “I met only one person in Gaza wearing green. Glory to the Resistance.” Based on these messages, I believe that H.H. and **WASHBURN** use green heart emojis to refer to Hamas and black heart emojis to refer to PIJ.¹⁷ It should be noted that, in most of the photographs of H.H. recovered by the JTTF, he is clad almost entirely in black.

15. In a WhatsApp conversation on March 21, 2025, H.H. stated that they had just finished “work.” **WASHBURN** responded, “[p]raise be to God. May God grant you victory. May God bless the Resistance.” H.H. lamented, “[t]he resistance has ended unfortunately”

¹⁶ The United States Office of the Director of National Intelligence (DNI) Counterterrorism Guide identifies the Izz Al-Din Al-Qassam Brigades as Hamas’s military wing (<https://www.dni.gov/nctc/groups/hamas.html> as of April 29, 2026).

¹⁷ Hamas uses the color green as a primary symbol incorporated into flags, banners and headbands to represent its Islamic identity. PIJ uses the color black on flags and other paraphernalia to symbolize jihad.

and “[t]he equipment is running out.” **WASHBURN** encouraged H.H. stating, “You do not need equipment, you only need Allah.” H.H. agreed but added that they needed to defend their children, women and the elderly. **WASHBURN** stated, “ Hamas is ready to fight.” H.H. responded, “[a]nd we also are ready,” followed by “🙄❤️👉”. H.H. added, “[b]ut unfortunately here in central Gaza I do not know the lay of the land as I do in Beit Hanoun.” **WASHBURN** asked whether H.H. needed maps. After H.H. responded affirmatively, **WASHBURN** offered to send him maps. H.H. specified he did not need a road map but, “[y]ou know what I mean,” “[w]hich map,” and sent the following rocket emoji 🚀. I believe that H.H. was referring to the need for a topographical map that could be used for tactical military purposes. In response, **WASHBURN** said, “I can ask my friend for help he is ❤️👤.” Based on the context of these messages, and my training and experience, I believe that **WASHBURN** was stating that her friend was a Hamas militant. H.H. then said “[n]o, no. Catherine, don’t do this,” and “[t]hese matters are very sensitive. Don’t do this.”

16. In a WhatsApp conversation on April 21, 2025, **WASHBURN** and H.H. again appeared to use green and black heart emojis to distinguish between Hamas and PIJ. During this exchange, H.H. continued to affiliate himself with PIJ. H.H. mentioned that he witnessed an ambush in Beit Hanoun in which “we took down the enemy.” **WASHBURN** then asked whether H.H. was part of the ambush. H.H. provided the following response:

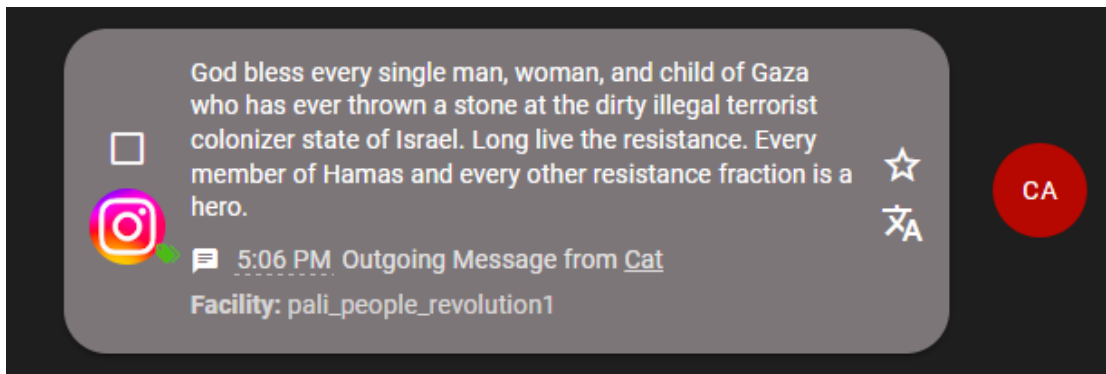


This message translated to, “[i]t is him [green heart emoji inserted],” which I believe was a reference to Hamas. **WASHBURN** responded, “[m]ay God bless the resistance.” After briefly discussing H.H.’s hometown of Beit Hanoun, H.H. sent the following message:



This message translated to, “[i]t’s our turn now [black heart emoji followed by face emoji inserted],” which I believe was a reference to PIJ. **WASHBURN** then responded with, “I pray that God grants you victory and sends His angels to protect you [black heart emoji inserted],” which I believe was a reference to PIJ. H.H. said, “[h]onestly I got really excited after seeing the ambush and how it unfolded.” **WASHBURN** replied, “I feel excited every time I see news of the killing of an occupation soldier.” H.H. responded, “[m]e too.”

17. On May 6, 2025, **WASHBURN** sent the following message from her Instagram account, *pali_people_revolution1*:



18. In a WhatsApp message on August 6, 2025, **WASHBURN** said she had designed a shirt and asked if H.H. wanted to see it. H.H. told her to show him. **WASHBURN** then sent an image depicting the front of a white sweatshirt design with the text “Freedom Fighters” and a red triangle breaking a chain, and a second image depicting the left sleeve of the white sweatshirt design with six logos arranged in a single column down the sleeve. From the top of the sleeve to the bottom, the logos related to the following Palestinian militant

organizations: Hamas,¹⁸ Abu Ali Mustafa Brigades (Popular Front for the Liberation of Palestine (PFLP)),¹⁹ Al-Qassam Brigades,²⁰ National Resistance Brigades,²¹ Jund Ansar Allah, and Al-Nasser Salah al-Deen Brigades. H.H. responded that the sweatshirt was “very, very beautiful” and that he “really love[d]” it. A screenshot of the white sweatshirt design with six logos is below.



a. **WASHBURN** then asked, “[d]id you forget any of the group’s slogans?” H.H. responded, “[y]es, the slogan of Islamic Jihad ... Yes, she didn’t put the Islamic Jihad logo.” Notably, H.H. surrounded these statements with black heart emojis. **WASHBURN** stated,

¹⁸ The DOS designated Hamas as an FTO on October 8, 1997.

¹⁹ The DOS designated the PFLP as an FTO on October 8, 1997.

²⁰ The Al-Qassam Brigades are the military arm of Hamas in Gaza.

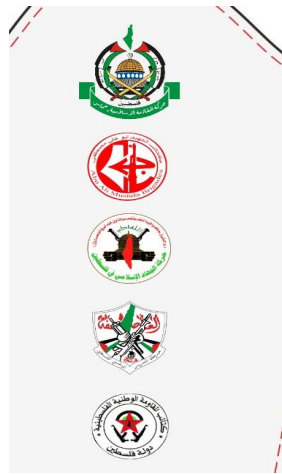
²¹ The National Resistance Brigades are the military wing of the Democratic Front for the Liberation of Palestine, which was delisted as an FTO by the DOS on October 8, 1999.

“[o]kay, I’ll add this. I thought I added it, but I wasn’t sure.” **WASHBURN** then sent the below image depicting the logo for Palestine Islamic Jihad (PIJ).²²



b. H.H. responded that this logo (the PIJ logo) was the most important one that should have been added. H.H. then stated, “there are only three logos”—“Fatah movement logo,” “ Hamas movement logo,” and “Islamic Jihad movement [PIJ] logo.” **WASHBURN** asked, “[w]hat about the Popular Front for the Liberation of Palestine [PFLP]?” H.H. responded, “[y]es, yes ... I forgot about it ... Sorry.” **WASHBURN** then said, “I’ll fix the blouse and you can approve it.” She then sent an image depicting the left sleeve of the white sweatshirt design with five logos arranged in a single column down the sleeve. From the top of the sleeve to the bottom, the logos related to Hamas, Abu Ali Mustafa Brigades (PFLP), PIJ, Fatah, and the National Resistance Brigades. A screenshot of the white sweatshirt design with five logos is below.

²² As detailed, *supra*, the DOS designated PIJ as an FTO on October 8, 1997.



c. H.H. approved of the new design. **WASHBURN** then sent H.H. an image depicting a black sweatshirt design with the DAMPL logo and text reading, “Our Blood Lines May Differ But Our Chains Are The Same,” and an image of the left sleeve of the black sweatshirt design with the five logos of the Palestinian militant organizations referenced in subparagraph 18(b), above, arranged in a single column down the sleeve. Screenshots of the black sweatshirt design with the five logos and the reference to DAMPL are below.



d. Referring to the black sweatshirt design, **WASHBURN** stated, “Lions of Islamic Jihad.” H.H. responded, “[v]ery beautiful indeed ... It will sell out quickly.” **WASHBURN** added, “I hope so.” These messages indicate that **WASHBURN** is conducting fundraising to provide financial support to several FTOs (including PIJ), including by offering the above-referenced sweatshirts for sale.

19. On October 8, 2025, **WASHBURN** and H.H. exchanged photographs over WhatsApp. **WASHBURN** sent an image of H.H. holding a Glock pistol. The image appeared to be a photograph that H.H. took of himself and had shared with **WASHBURN** at an earlier time. **WASHBURN** also sent an image of H.H. aiming an AK-style rifle down range. Below are the two images shared by **WASHBURN**.



20. In a WhatsApp conversation on October 19, 2025, H.H. and **WASHBURN** discussed the Al-Qassam Brigades executing “collaborators and spies” on the first day of the ceasefire between Hamas and Israel. During the Al-Qassam Brigades operation, an Israeli

tank or armored vehicle was allegedly struck by fire. H.H. and **WASHBURN** indicated that they did not believe the Israelis were targeted and instead believed that the incident was being used by the Israel Defense Forces (IDF) as a pretext to strike Hamas militarily. At 9:00 p.m., H.H. said the Al-Qassam Brigades did not shell or kill that day. Later, at 9:21 p.m., **WASHBURN** had a Threema²³ text conversation with one of the other leaders of DAMPL, in which **WASHBURN** stated, “I just heard from my friend in the pij [sic] that the story of qassam hitting the tank was fabricated by the occupation.” Based on the context and timing of this message, I believe that **WASHBURN** was referring to H.H. when she mentioned her “friend in the PIJ.”

21. In the evening on October 29, 2025, H.H. sent **WASHBURN** a WhatsApp message stating, “Tomorrow I have a mission in northern Gaza.” **WASHBURN** and H.H. then exchanged messages about ammunition and firearms. Specifically, H.H. stated, “This is my last bullet.” **WASHBURN** guessed that the bullet was a 5.56mm/caliber, and H.H. replied, “m1040 . . . m1240.” H.H. noted that bullets in Gaza “have become locally produced,” and that most of the firearms in Gaza were Russian, Chinese, Romanian, or Libyan. **WASHBURN** then stated that “they” had captured new Israeli Tavor rifles, which was a reference to an assault rifle manufactured by Israel Weapon Industries and used by Israeli military forces. H.H. responded, “[t]his was rare in Gaza ... We seized it from the army.” **WASHBURN** then stated, “[w]hen they handed over the prisoners during the last ceasefire, Hamas guards were wearing them” (Tavor rifles), and then said, “[t]he humiliated occupation.”

²³ Threema is a secure messaging application that focuses on data protection and privacy.

22. In the early morning on October 30, 2025, H.H. resumed the text conversation stating, “I will go to northern Gaza.” **WASHBURN** told H.H. to “be careful.” Later that same day, at approximately 5:13 p.m., H.H. reported to **WASHBURN**, “I went north and the air was full of dust and I got dirty ... And I finished my mission ... Then I went to a café and met up with my friends who were with me at Beit Hanoun.” Based on my knowledge of this investigation and my training and experience, I believe that the way H.H. and **WASHBURN** transitioned the text conversation regarding firearms and ammunition to the cryptic references to the “mission” without providing further details of the “mission,” indicates that H.H. was engaged in an armed operation in Beit Hanoun.

Washburn’s Fundraising Efforts in the name of H.H. and for the Benefit of PIJ

23. A review of **WASHBURN**’s public Facebook account shows that she began a fundraising campaign in the name of H.H. in or about November 2024. As detailed herein, **WASHBURN** learned of H.H.’s purported affiliation with PIJ in February 2025. Thereafter, she continued to raise funds in the name of H.H. but for the benefit of PIJ.

24. Below is a screenshot of a post from the Facebook account from March 20, 2025 (over a month after she learned that H.H. claimed to be a PIJ fighter), in which **WASHBURN** sought donations for H.H.²⁴ to “help him support his family of 9.” The post contained an image of H.H.

²⁴ **WASHBURN** referred to H.H.’s first name.

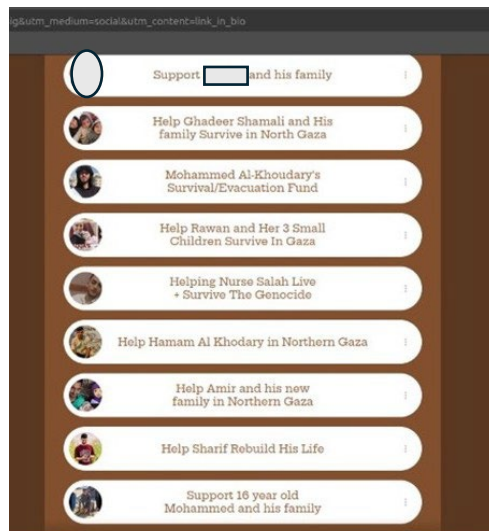
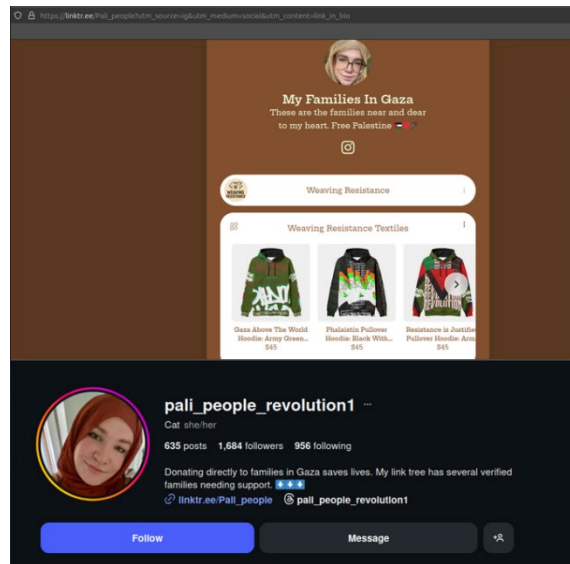


25. **WASHBURN** has also used a fundraising platform known as Chuffed.org.²⁵ Public information shows that there is a fundraising campaign on Chuffed.org titled, “Support [H.H.]²⁶ From Gaza,” which states, in sum and substance, that H.H. is a “21 year old young man from Gaza,” who needs money to “assist [him] and his family [of 9] as they try to rebuild the life stolen from them by genocide.” This investigation has revealed that **WASHBURN** is leading this fundraising campaign. In two Whatsapp messages on November 30, 2025, **WASHBURN** sent the link to H.H.’s fundraising page to others. **WASHBURN** also has a Linktree²⁷ page where she provides links to several Chuffed fundraising campaigns, including the one in H.H.’s name, and offers Palestinian resistance-themed clothing for sale. Below are screenshots of her Linktree page from December 11, 2025.

²⁵ “Chuffed is a crowdfunding platform for socially-conscious projects” based in Australia. <https://chuffed.org>.

²⁶ The title of the campaign includes only H.H.’s first name.

²⁷ Linktree is a tool that creates a single landing page for all of a person’s social media links.



Washburn’s Transfer of Cryptocurrency to H.H.

26. In connection with this investigation, the JTTF conducted an analysis of financial records and determined that **WASHBURN** was sending cryptocurrency to H.H. As part of that analysis, the investigative team obtained and reviewed financial records from Bank of America (“BOA”), Coinbase, Inc. (“Coinbase”), and Bybit. Below are the relevant accounts reviewed by the investigative team.

a. Subpoenaed records from BOA show that **WASHBURN** opened a checking account ending in 1302 (“BOA account 1302”) on October 24, 2024. This account is registered to **CATHERINE WASHBURN** at 180 Auramar Drive, Rochester, New York. **WASHBURN** is the sole signatory on the account.

b. Subpoenaed records from Coinbase show that **WASHBURN** created an account with a User ID ending in c36c5e (“**WASHBURN**’s Coinbase account”) on September 19, 2025. This account is registered to **CATHERINE WASHBURN** at 180 Auramar Drive, Rochester, New York, and is linked to the email address **catbethflaherty@gmail.com** and telephone numbers (585) 474-6794 and (585) 519-3093. The ACH payment method listed for this account is BOA account 1302. This account includes a BTC²⁸ wallet and a USDC wallet.

c. Records obtained from Bybit show that a Bybit account with a User ID 501075659 is registered to H.H. This account contains multiple wallets, including one beginning with “0xdd166” (“Bybit wallet 0xdd166”). The email address associated with this account is hamdh7371@gmail.com, and the country of nationality for accountholder is listed as Palestine. In three WhatsApp messages to **WASHBURN** on March 28, 2025, H.H. provided Bybit wallet 0xdd166 as the wallet where he could receive USDC cryptocurrency. Based on the name registered to the account, the fact that the email address associated with the account belongs to H.H.,²⁹ the fact that H.H. is Palestinian, and the fact that H.H. provided Bybit wallet 0xdd166 as his USDC wallet, I believe that this account is owned and used by H.H.

²⁸ “BTC” is a reference to Bitcoin, which is the world’s first widely-adopted cryptocurrency.

²⁹ H.H. provided this email address to **WASHBURN** in a WhatsApp message on October 2, 2025.

27. From October 24, 2024, through January 2026, BOA account 1302 received funds from various sources including PayPal, Stripe and Zelle. As detailed above, **WASHBURN** managed a fundraising campaign in the name of H.H. through Chuffed.org and received funds from the campaign through PayPal transfers to BOA account 1302.

28. Between September 21, 2025, and April 7, 2026, **WASHBURN** purchased approximately 33,749 USDC for her Coinbase account using funds in BOA account 1302. In that same time period, **WASHBURN** conducted approximately 80 transfers totaling approximately 30,116 USDC from her Coinbase account to H.H.'s Bybit wallet 0xdd166. Beginning on October 8, 2025, **WASHBURN** periodically purchased USDC using funds from BOA account 1302. The USDC purchases were then deposited into her USDC wallet, and the same amounts of USDC were then promptly sent from **WASHBURN'S** USDC wallet to Bybit wallet 0xdd166. This pattern of buying USDC and almost immediately thereafter sending it to Bybit wallet 0xdd166 occurred numerous times between October 2025 and April 2026, with the most recent transfer occurring on or about April 6, 2026.³⁰ Generally, the USDC was purchased and sent the same day and in the same amounts, but there were some instances where a few days passed before the USDC was sent or the purchased USDC was sent in increments.

29. Below is a chart documenting the transfers from **WASHBURN'S** Coinbase account to H.H.'s Bybit wallet 0xdd166 (as of April 6, 2026).³¹

³⁰ This date is based on records received from Coinbase that cover the time period through April 7, 2026.

³¹ The transfers from **WASHBURN'S** Coinbase account to Bybit wallet 0xdd166 were traced using the dates/times, amounts, and/or unique transaction hashes for the transactions.

NUMBER	DATE OF TRANSFER	AMOUNT OF TRANSFER (USDC)	DESTINATION
1	10/8/2025	200	Bybit wallet 0xd166
2	10/11/2025	550	Bybit wallet 0xd166
3	10/16/2025	700	Bybit wallet 0xd166
4	10/17/2025	50	Bybit wallet 0xd166
5	10/19/2025	400	Bybit wallet 0xd166
6	10/23/2025	150	Bybit wallet 0xd166
7	10/25/2025	2,300	Bybit wallet 0xd166
8	10/28/2025	2,600	Bybit wallet 0xd166
9	11/2/2025	1,000	Bybit wallet 0xd166
10	11/7/2025	1,000	Bybit wallet 0xd166
11	11/13/2025	500	Bybit wallet 0xd166
12	11/14/2025	100	Bybit wallet 0xd166
13	11/25/2025	3,000	Bybit wallet 0xd166
14	11/30/2025	100	Bybit wallet 0xd166
15	11/30/2025	200	Bybit wallet 0xd166
16	12/2/2025	500	Bybit wallet 0xd166
17	12/5/2025	1,200	Bybit wallet 0xd166
18	12/12/2025	1,000	Bybit wallet 0xd166
19	12/20/2025	1,000	Bybit wallet 0xd166
20	12/25/2025	60	Bybit wallet 0xd166
21	12/27/2025	25	Bybit wallet 0xd166
22	12/27/2025	110	Bybit wallet 0xd166
23	12/28/2025	100	Bybit wallet 0xd166
24	12/28/2025	200	Bybit wallet 0xd166
25	12/28/2025	100	Bybit wallet 0xd166
26	12/28/2025	100	Bybit wallet 0xd166
27	12/28/2025	170	Bybit wallet 0xd166
28	1/1/2026	970	Bybit wallet 0xd166
29	1/2/2026	250	Bybit wallet 0xd166
30	1/3/2026	50	Bybit wallet 0xd166
31	1/4/2026	200	Bybit wallet 0xd166
32	1/6/2026	551	Bybit wallet 0xd166
33	1/8/2026	350	Bybit wallet 0xd166
34	1/10/2026	400	Bybit wallet 0xd166
35	1/13/2026	395	Bybit wallet 0xd166
36	1/16/2026	300	Bybit wallet 0xd166
37	1/18/2026	355	Bybit wallet 0xd166
38	1/30/2026	80	Bybit wallet 0xd166
39	1/31/2026	500	Bybit wallet 0xd166
40	2/2/2026	100	Bybit wallet 0xd166
41	2/4/2026	150	Bybit wallet 0xd166
42	2/5/2026	200	Bybit wallet 0xd166
43	2/8/2026	100	Bybit wallet 0xd166

44	2/10/2026	150	Bybit wallet 0xd166
45	2/12/2026	125	Bybit wallet 0xd166
46	2/13/2026	550	Bybit wallet 0xd166
47	2/13/2026	200	Bybit wallet 0xd166
48	2/15/2026	200	Bybit wallet 0xd166
49	2/17/2026	100	Bybit wallet 0xd166
50	2/21/2026	25	Bybit wallet 0xd166
51	2/21/2026	50	Bybit wallet 0xd166
52	2/22/2026	40	Bybit wallet 0xd166
53	2/24/2026	110	Bybit wallet 0xd166
54	2/24/2026	100	Bybit wallet 0xd166
55	2/26/2026	275	Bybit wallet 0xd166
56	2/26/2026	700	Bybit wallet 0xd166
57	2/28/2026	300	Bybit wallet 0xd166
58	3/1/2026	200	Bybit wallet 0xd166
59	3/3/2026	150	Bybit wallet 0xd166
60	3/6/2026	250	Bybit wallet 0xd166
61	3/10/2026	226	Bybit wallet 0xd166
62	3/11/2026	150	Bybit wallet 0xd166
63	3/11/2026	150	Bybit wallet 0xd166
64	3/13/2026	150	Bybit wallet 0xd166
65	3/13/2026	150	Bybit wallet 0xd166
66	3/13/2026	125	Bybit wallet 0xd166
67	3/14/2026	150	Bybit wallet 0xd166
68	3/16/2026	664	Bybit wallet 0xd166
69	3/16/2026	151	Bybit wallet 0xd166
70	3/18/2026	250	Bybit wallet 0xd166
71	3/18/2026	113	Bybit wallet 0xd166
72	3/20/2026	350	Bybit wallet 0xd166
73	3/21/2026	250	Bybit wallet 0xd166
74	3/24/2026	260	Bybit wallet 0xd166
75	3/25/2026	112	Bybit wallet 0xd166
76	3/27/2026	370	Bybit wallet 0xd166
77	3/27/2026	155	Bybit wallet 0xd166
78	3/31/2026	125	Bybit wallet 0xd166
79	4/4/2026	212	Bybit wallet 0xd166
80	4/6/2026	112	Bybit wallet 0xd166
	TOTAL	30,116	

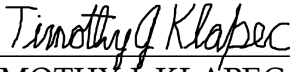
30. In a WhatsApp message on November 24, 2025, **WASHBURN** stated, “[b]ased on my passed [sic] fundraising and posting Im [sic] gonna get put away for a few life times,”

and included what appears to be a laughing emoji. This statement by **WASHBURN** indicates that she believes that she could face prison time based on her fundraising activities, which in turn shows that she knows at least some of those activities violated the law. I further believe that this statement – taken together with the messages and financial records summarized in this affidavit and **WASHBURN's** use of cryptocurrency to get funds to H.H. – indicates that **WASHBURN** has been raising funds and sending financial support for H.H. knowing that it would benefit PIJ. The promotional/fundraising statements give the appearance of asking the public to provide money for H.H. for the purpose of helping him support his family. On the other hand, items **WASHBURN** designed for sale to raise that money included the symbols of PIJ and other FTOs. Moreover, the above-described messages indicate that H.H. discussed with **WASHBURN** his claimed missions and operations against Israel, as well as operational issues, such as the shortage of ammunition and their need for a map of central Gaza. H.H.'s and **WASHBURN's** own words confirmed **WASHBURN's** intent to provide material support to H.H.'s and PIJ's terrorist activities and not to provide humanitarian aid, believing that H.H. was affiliated with PIJ. As stated in ¶ 11(f) above, H.H. told **WASHBURN** “[y]our assistance to us here in Gaza is fighting in the path of Allah.” **WASHBURN** then stated, “Allah willing. This battle is a sacred battle.” In sum, when **WASHBURN** raised funds for H.H., the publicly stated purpose was for H.H. and his family, but the messages show **WASHBURN** was raising funds to support H.H.'s purported activities on behalf of PIJ.


CONCLUSION

31. Based on the foregoing, there is probable cause to believe that **CATHERINE BETH WASHBURN** has knowingly attempted to provide material support and resources,

namely, currency, to a designated FTO, namely, Palestine Islamic Jihad (a/k/a Al Quds Brigades) (PIJ), knowing that PIJ was a designated FTO, and that PIJ had engaged in and was engaging in terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).


TIMOTHY J. KLAPEC
Special Agent
Federal Bureau of Investigation

Affidavit submitted electronically in .pdf format. Oath administered, and contents and signature attested to me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on June 29, 2026.


HONORABLE MARK W. PEDERSEN
United States Magistrate Judge
Western District of New York