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U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

OCT 06 2025

UNITED STATES DISTRICT COURT

for the

Western District of Louisiana

DANIEL J. MCCOY, CLERK

BY: 

United States of America

v.

MAHMOUD AMIN YA'QUB AL-MUHTADI

Case No.

6:25-mj-00183

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 October 7, 2023 and June 24, 2024 in the county of Lafayette in the
Western District of Louisiana, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1546

Fraud and misuse of visa, permits, and other documents

18 U.S.C. § 2339B

Providing, attempting to provide, or conspiring to provide material support to a foreign terrorist organization

This criminal complaint is based on these facts:

See Affidavit, attached hereto

☒ Continued on the attached sheet.*Complainant's signature*

Alexandria M. Thoman O'Donnell, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: October 6, 2025*Judge's signature*City and state: Lafayette, Louisiana

David J. Ayo, United States Magistrate Judge

Printed name and title

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U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

OCT 06 2025

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

BY: DANIEL J. McCOY, CLERK 

LAFAYETTE DIVISION

UNITED STATES OF AMERICA

* CASE NO.: 6:25-mj-00183-AYO

*

VERSUS

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* **FILED UNDER SEAL**

MAHMOUD AMIN YA'QUB AL-MUHTADI

*

Criminal Complaint

I, Supervisory Special Agent Alexandria M. Thoman O'Donnell, being first duly sworn,
hereby depose and state as follows:

Introduction and Agent Background

1. I am a Supervisory Special Agent with the Federal Bureau of Investigation and have been so employed since 2017. From 2013 until 2017, I worked for the U.S. Department of State in counterterrorism foreign policy and terrorist designations and sanctions, where I designated Foreign Terrorist Organizations ("FTOs") under Section 219 of the Immigration and Nationality Act. I received my basic field training at the FBI Academy in Quantico, Virginia. Upon graduation I was assigned to the Baltimore Division, where I worked sensitive counterterrorism investigations for five years and violent crime investigations for two years. During my tenure with the FBI and the U.S. Department of State, I have led and participated in the investigations of numerous international and domestic terrorism violations and, among other things, have conducted or participated in surveillances, debriefings of informants, reviews of taped conversations and records, and the executions of search and tracking warrants. In 2024, I was promoted to the Counterterrorism Division at FBI Headquarters. I am currently assigned to the Attorney General's Joint Task Force

10-7 (“JTF 10-7”). My duties with the JTF 10-7 are focused on investigating the murders and kidnappings of dozens of American citizens who were either killed, taken captive, or died in captivity as a result of the Hamas terrorist attacks against Israel on October 7, 2023.

2. This affidavit is submitted in support of a criminal complaint alleging that Mahmoud Amin Ya’qub Al-Muhtadi (“Al-Muhtadi,” also known as “Abu Ala”)—a resident of Lafayette, Louisiana—violated Title 18, United States Code, Section 2339B (providing, attempting to provide, or conspiring to provide material support to a foreign terrorist organization), based on his involvement in the October 7, 2023 Hamas-led attack on Israel; and Title 18, United States Code, Section 1546 (fraud and misuse of visa, permits, and other documents), based on false statements he provided on his U.S. Visa application relating to his involvement with a paramilitary organization, connection to Hamas, participation in a terrorist attack, and military training (collectively, the “Subject Offenses”).
3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging Al-Muhtadi with the Subject Offenses, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Al-Muhtadi committed the offenses alleged in the complaint.
4. This affidavit is based on my personal knowledge, my experience and training, information provided to me by other law enforcement agents and the experience and training of those agents, my review of location information, recorded telephone communications, email and social media communications, numerous witness interviews, open-source information, and information provided by Israel.

5. Reference is made to recorded or written communications in the affidavit. In certain instances, these communications are summarized, excerpted, and placed in context, and my interpretations are sometimes noted in brackets. My understanding of these communications is aided by the contents and context of the conversations, my familiarity with the facts and circumstances of this investigation, my experience as a law enforcement officer, my discussion with other law enforcement officers, the experience of other law enforcement officers in this investigation, and other evidence developed in the course of the investigation. Many of the communications, and other documents referenced herein, are in Arabic, and my review and interpretation of these conversations and documents is based on English-language transcripts of the conversations created by Arabic linguists.

Facts Establishing Probable Cause

6. As detailed below, Al-Muhtadi is an operative for the Democratic Front for the Liberation of Palestine's ("DFLP") military wing, the National Resistance Brigades ("NRB", also known as the "Martyr Umar al-Qasim Forces"), a Gaza-based paramilitary group that participated in the Hamas-led terrorist attack against Israel on October 7, 2023. Evidence shows that on the morning of October 7, 2023, Al-Muhtadi learned about the Hamas invasion, armed himself, gathered others, and crossed into Israel with the intention of assisting in Hamas's terrorist attack. Evidence shows that Al-Muhtadi's phone utilized a cell tower located near Kibbutz¹ Kfar Aza in Israel, the location of a horrifying massacre by Hamas and its supporters. Evidence further shows that Al-Muhtadi provided false information in his U.S. Visa application relating to his involvement with a paramilitary organization, connection to Hamas, participation in a terrorist attack, and military training.

¹ A "kibbutz" (plural "kibbutzim") refers to the Hebrew word for "gathering." It is a type of residential compound common in Israel typically organized to promote communal living.

As a result of that false application, Al-Muhtadi was able to obtain permission to travel to the United States and obtain Legal Permanent Resident status. Al-Muhtadi is currently residing and working in Lafayette, Louisiana.

Background on Hamas

7. Hamas, and its military wing, the Izz al-Din al-Qassam Brigades, have claimed responsibility for numerous mass-casualty terrorist attacks perpetrated in Israel, the West Bank, and the Gaza Strip since Hamas's founding in 1987.² As a result of this terrorist activity, on October 8, 1997, the United States Secretary of State designated Hamas as an FTO under Section 219 of the Immigration and Nationality Act. On October 31, 2001, the Secretary of State also designated Hamas as a Specially Designated Global Terrorist under Executive Order 13224. The Secretary of State has also listed the following aliases for Hamas: Islamic Resistance Movement, Harakat al-Muqawama al-Islamiya, Students of Ayyash, Students of the Engineer, Yahya Ayyash Units, Izz Al-Din Al-Qassim Brigades, Izz Al-Din Al-Qassim Forces, Izz Al-Din Al-Qassim Battalions, Izz al-Din Al Qassam Brigades, Izz al-Din Al Qassam Forces, and Izz al-Din Al Qassam Battalions. To date, Hamas remains a designated FTO.

The October 7, 2023, Attack on Israel

8. On October 7, 2023, at approximately 6:30 a.m. in Israel, the terrorist organization Hamas launched the deadliest terror attack in Israel's history. Using the cover of a massive rocket attack, thousands of Hamas terrorists and affiliated supporters swarmed over the border between the Gaza Strip and Israel and launched wave after wave of attacks on Israeli

² I know that Hamas is an acronym for Harakat al-Muqawamah al-Islamiyyah ("Hamas"), an FTO, and that the provision of material support or resources to Hamas, or other FTOs, violates 18 U.S.C. § 2339B. Since 2007, Hamas has governed Gaza, a narrow strip of land on the Mediterranean coast. Israel is to Gaza's north and east, whereas Egypt is located to its south.

civilians. Many of these murders occurred in kibbutzim near the Gaza border, where Hamas and its supporters went house to house murdering or kidnapping anyone they found, including children and the elderly, sometimes entire families. Some victims of the attack were shot point-blank with rifles, some were tortured, some were sexually assaulted, some were beheaded. The over 1,200 people murdered and 250 kidnapped by Hamas and its supporters on October 7, 2023, included approximately 49 murdered and 11 kidnapped American citizens.

9. The initial wave of attackers was largely from Hamas's "Nukhba" fighters, the elite special forces unit of Hamas's Al-Qassam Brigades (the military wing of Hamas). However, at approximately 7:53 a.m., then-commander of the Al-Qassam Brigades, Mohammad Al-Masri, a/k/a "Mohammed Deif," a/k/a "Muhammad Al-Deif," a/k/a "Abu Khalid Al-Dayf" ("Deif"),³ issued a message (screenshot below) announcing the "Al-Aqsa Flood Operation" and inviting "the masses" to rise up and join Hamas in its fight to destroy Israel. He stated that in just the first 20 minutes of the Operation, Hamas had launched over 5,000 rockets and missiles targeting Israel. He called on "all Arab and Islamic forces to unite" to follow Hamas's "directives and instructions," and advised any who would join Hamas's attack to "kill [Israelis] wherever you overtake them," to "[o]rganize your attacks on the settlements with all the means and tools available to you," and to "establish[] the state, with blood and martyrdom." He stated:

Today, today, everyone who has a rifle, take it out, as now is the time. And whoever doesn't have a rifle, take out your machete, your axe, your hatchet, your Molotov cocktail, your truck, your bulldozer, or your car. Today, today, history opens its brightest, most glorious, and most honorable pages. So,

³ On September 8, 2015, the Department of State designated Deif as a Specially Designated Global Terrorist pursuant to Executive Order 13224.

who will record his name, the name of his family, and the name of his town in the pages of light and glory?



10. Following this message, thousands of additional attackers swarmed across the border from Gaza into Israel in support of Hamas's invasion. There, they assisted Hamas in murdering and kidnapping civilians.
11. Al-Muhtadi, a then-Gaza-based member of the Hamas-aligned paramilitary group DFLP, was among those who answered Hamas's call to arms. Al-Muhtadi was alerted on social media of Hamas's attack by 6:34 a.m., just after it began. Starting at 8:12 a.m., minutes after Hamas publicly requested its supporters' help to attack Israel and kill Jews, Al-Muhtadi told others he intended to cross into Israel. Referencing Deif's message, he spent the next two hours coordinating a group of armed fighters to join him in traveling from Gaza into Israel to participate in Hamas's attack. By approximately 9:33 a.m., Al-Muhtadi's group had crossed the border into Israel and by approximately 10:01 a.m., Al-Muhtadi was in the vicinity of a cell tower near Kfar Aza.

American Citizen Victims in the Vicinity of the Kfar Aza Cell Tower

12. As previously noted, during the October 7, 2023, attack, at approximately 10:01 a.m., Al-Muhtadi's phone connected to a cell tower nearby the Kibbutz Kfar Aza (image below).

Recorded calls show that Al-Muhtadi used that same phone to organize a group to participate in Hamas's attack that day. In Kfar Aza alone, one of the dozens of kibbutzim attacked, Hamas and its supporters murdered approximately 60 citizens and kidnapped 19 more, including one kidnapped American citizen and more than four murdered American citizens. Examples of three such victims are described below.

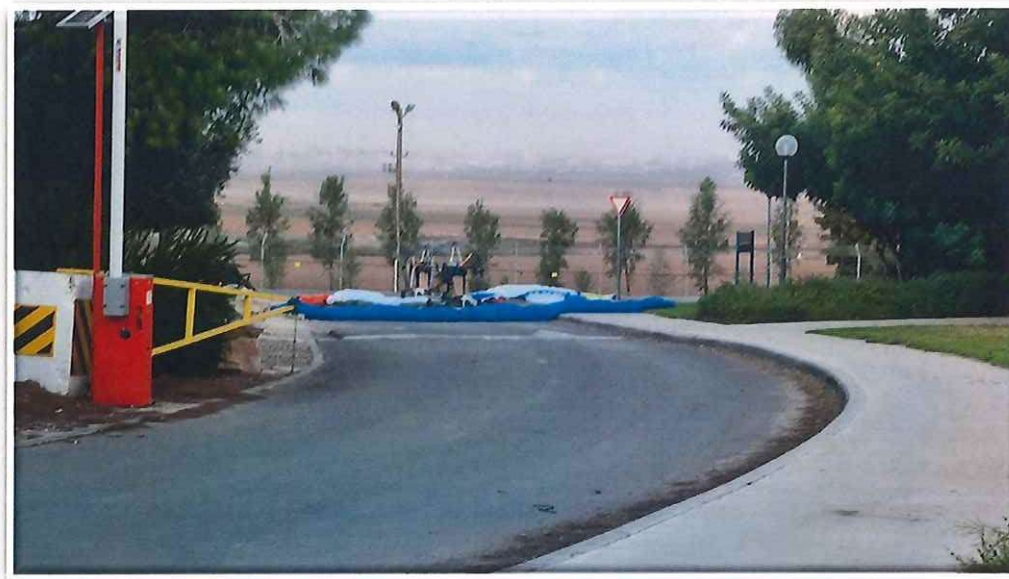


Victim 1

13. Victim 1⁴ was a 38-year-old American citizen living in Kfar Aza near its westernmost fence. At approximately 6:30 a.m., Hamas launched a massive missile attack on Israel, which triggered sirens in the kibbutzim near the Gaza border, including Kfar Aza. Victim 1's husband, a photographer, rushed outside and photographed multiple Hamas

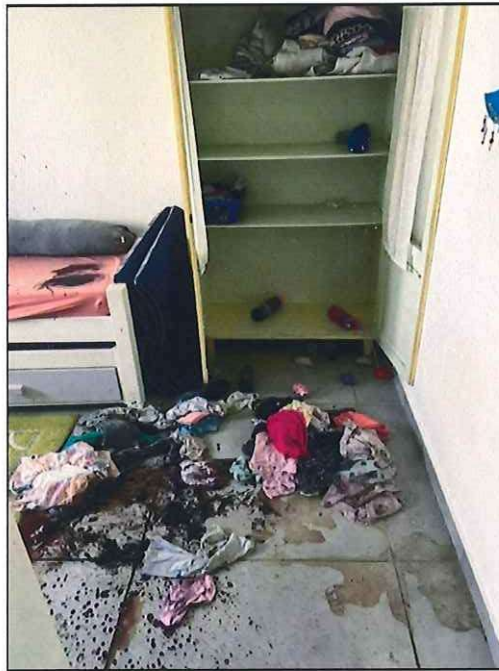
⁴ For ease of reference, several of the American-citizen victims of the attack on Kfar Aza are referenced in this Complaint as "Victim 1," "Victim 2," etc.; however, there were thousands of victims of the October 7, 2023, terrorist attack: victims from inside and outside Kfar Aza, and victims who were Israeli, American, or from many other parts of the world.

paragliders approaching the kibbutz from the air (below top) and landing in front of his and Victim 1's home (below bottom).



14. A neighbor of Victim 1 observed one of the paragliders crossing over the Kibbutz gate into the Kibbutz by approximately 6:40 a.m. Victim 1 was shot and killed inside the house. Victim 1's husband was shot and killed near their house shortly after taking the above two photographs. Two of Victim 1's children, ages six and nine, hid inside a wardrobe

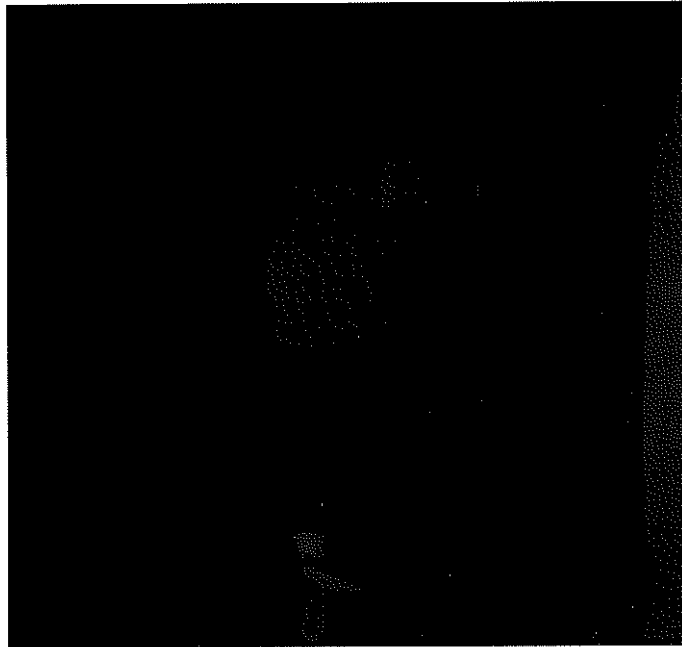
(photograph below) next to their mother's body for approximately twelve hours before being rescued. Victim 1's three-year old daughter fled, covered in her father's blood, to a nearby neighbor's house where, later that day, she was kidnapped by terrorists. Fifty days later, she was released as part of a hostage exchange.



Victim 2

15. Victim 2 was a 67-year-old American citizen living in Kfar Aza with her husband. Victim 2's adult daughter and granddaughter also lived in Kfar Aza. On October 7, 2023, Victim 2 and her husband moved into a shelter in their home around the time the Hamas rocket attack began. Victim 2 and her husband sent messages throughout the day to their children, and to their neighbors who were similarly sheltering in their homes. At approximately 5:02 p.m., Victim 2 sent messages to her neighborhood text group that terrorists broke into their safe room. She begged for someone to "come immediately." Around this time, a neighbor's dash camera captured an image of terrorists outside her home. Victim 2 and her husband appear to have been shot inside their home shortly

thereafter, likely through the safe room door (image below), which was riddled with bullet holes.



Victim 3

16. Victim 3 was a 22-year-old American citizen and member of the Israel Defense Forces (“IDF”). On October 7, 2023, Victim 3 was in Jerusalem with his wife when he learned about the Hamas attack. Victim 3, on his own initiative, travelled to the area of Kfar Aza to help to evacuate residents. Victim 3 assisted with rescuing people from the Kibbutz until he was killed by terrorists inside Kfar Aza later that day.

*Background on DFLP, its Relationship to Hamas, and its Involvement
in the October 7, 2023, Attack*

17. The DFLP is a Palestinian communist organization formed as an offshoot of the Popular Front for the Liberation of Palestine (“PFLP”) – an FTO. DFLP—and the DFLP’s military wing, the NRB—has participated in dozens of terrorist attacks against Israelis over the years, including the 1974 Ma’alot Massacre which resulted in the deaths of over 20 school children, and a 1984 mass shooting in Jerusalem that wounded 48. In October 1997, the

DFLP was designated as a terrorist organization by the U.S. State Department. It was delisted as an FTO in October 1999, but remains a listed Specially Designated Global Terrorist Organization by the U.S. Treasury Department.

18. The DFLP, particularly its NRB, openly participated in the Hamas attack against Israel on October 7, 2023. At approximately 9:13 a.m., on October 7, 2023, the NRB posted online that, along with the military wings of other resistance factions, it had infiltrated Israel. On October 8, 2023, the NRB released a statement claiming that its fighters were actively involved in the October 7 attack on Israel in Kibbutz Kfar Aza, Kibbutz Beerli, and Kibbutz Kissufim.
19. The DFLP appears to have also released a video on or about October 8, 2023, showcasing their participation in the “Al-Aqsa Flood”—the term used by Hamas to describe the October 7 attack. A video shared on social media appears to feature a montage of footage of armed DFLP fighters in Israel on October 7, 2023 (screenshot example below).



20. Based on open-source research, at least one DFLP member can be seen in footage from October 7, 2023, participating in the murder of a 21-year-old Tanzanian agriculture student who was kidnapped from inside Kibbutz Nahal Oz in Israel, and then repeatedly stabbed

and shot on a road nearby. As shown below, one of the individuals who murdered the student (below left, holding the student) was wearing a patch on his tactical vest (below middle) of the logo for the NRB (example below right).



21. The relationship between Hamas and DFLP predates October 7, 2023. In the years preceding the October 7 attack, Hamas and DFLP worked together as part of a “Joint Operations Room,” an organization created in 2018 to formalize and facilitate coordination between the various militant factions in Gaza in campaigns against Israel. For example, in a publicly available interview from June 2023, Ayman Nofal, then-head of the Al-Qassam Brigades’ Military Relations and member of its General Military Council, explained that the Joint Operations Room included Hamas’s military wing, the Al-Qassam Brigades; the Palestinian Islamic Jihad’s military wing, Saraya al-Quds; and the DFLP’s military wing, the NRB, among other factions. Nofal stated that “the resistance today has reached a stage where it is not possible to embark on war and confrontation except with a unified, collective, and well-thought-out decision” and that members of the Joint Operations Room participated in military campaigns in 2018, 2019, and 2021. Nofal further explained that coordination within the Joint Operations Room extended beyond times of war, to include constant communication between component factions; the sharing of operational and

intelligence assessments, logistical support, and armaments; and annual joint training exercises.

22. Based on open-source reporting, approximately one month before the attack, in September 2023, the Joint Operations Room conducted a military drill. Mohammad Deif stated, with regards to the drill: “[T]he armed resistance is the only way for Palestinians to liberate their historical lands and declare their own independent state. . . . [the armed groups] will force Israel to evacuate the West Bank and all the occupied Palestinian Territories.” Hamas also issued a statement on the drill, describing it as a “message of unity and strength on the internal and external level, and proof of the readiness of the resistance and its development on the field.”

23. Indeed, a review of search warrant returns for one of Al-Muhtadi’s social media accounts⁵ revealed that in April 2024, Al-Muhtadi sent another social media user an NRB propaganda video about the “Battle of Al-Aqsa Flood,” in which the battle is described as a “joint

⁵ Law enforcement has identified and obtained authorization to search multiple social media and email accounts which—based, among other things, on subscriber information, photographs, and messages—law enforcement has identified as used by Al-Muhtadi.

operation” between the military wings of Hamas, DFLP, and the Palestinian Islamic Jihad.

A screenshot from the video shows three headbands placed above five mortar projectiles:

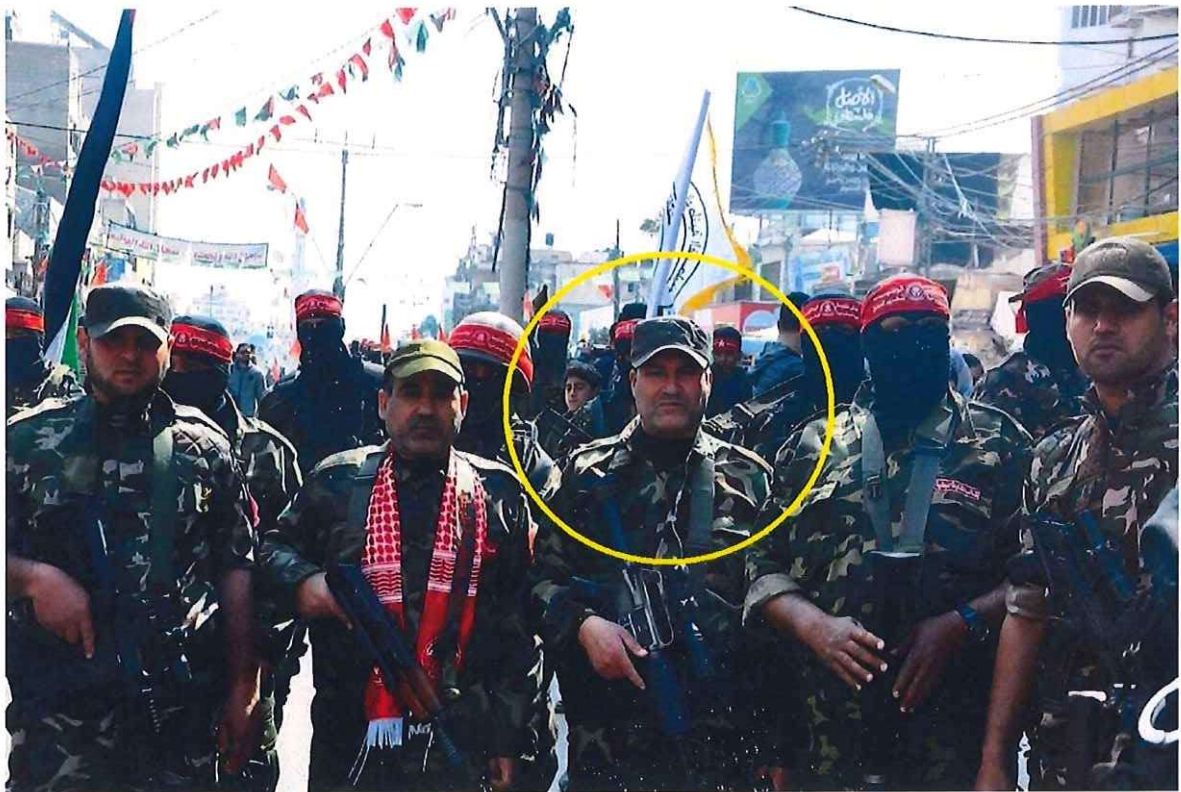


24. In the above image, the green headband is labeled with “Kata’ib al-Qassam,” which I know to mean the al-Qassam Brigades, Hamas’s military wing; the red headband is labeled with “Kata’ib al-Muqawama al-Wataniya,” which I know to mean the NRB, DFLP’s military wing; and the black headband is labeled with “Saraya al-Quds,” which I know to mean the al-Quds Brigades, the Palestinian Islamic Jihad’s military wing. The image is captioned with a statement claiming that all three groups are together targeting enemy forces in the southeast al-Zaytun neighborhood, located in the northern area of the Gaza Strip, using mortar shells.

25. In May 2023, Al-Muhtadi also sent a message on his social media account containing a statement regarding the timing of missile strikes by the NRB on Israeli kibbutzim as part of the Joint Operations Room, as well as the following statement: “Within the framework

of the Joint Chamber [Joint Operations Room] of the resistance Factions, and within the battle of 'Revenge of the Free' in response to the assassination of the martyred leaders and the continuous Zionist aggression against our people."

26. Further, based on a review of Al-Muhtadi's social media accounts, as well as an account belonging to another individual who appears to be a fellow member of DFLP (for which law enforcement obtained authorization to search), law enforcement has identified an individual ("Subject 1") who appears to be a leader of DFLP and who, in that capacity, engaged with leaders of Hamas. For example, photographs on the accounts show an individual who appears to be Subject 1 at various DFLP functions (example, below top, Subject 1 circled in yellow) and attending a meeting with the former leader of Hamas, Yahya Sinwar (below middle, Sinwar circled in red and Subject 1 circle in yellow):





27. In summary, based on the investigation to date, I believe DFLP and its NRB have a longstanding close relationship with Hamas and, in that capacity, participated and assisted Hamas with its attack on Israel on October 7, 2023.

*Al-Muhtadi is a DFLP NRB Operative
who Participated in the October 7, 2023, Attack*

28. In May 2025, the Government of Israel, who I know has a history of sharing reliable and accurate information with the United States Government, provided information to the United States Government that an individual named Mahmoud Amin Ya'qub Al-Muhtadi was a DFLP operative and member of DFLP's military wing, the NRB, who participated in the October 7, 2023, attack and fled Gaza.

29. A review of the contents of Al-Muhtadi's aforementioned social media and email accounts revealed extensive evidence of Al-Muhtadi's affiliation with the NRB. For example, on or

about April 9, 2019, an unidentified social media user sent Al-Muhtadi several photographs of Al-Muhtadi (wearing the red headband) and another individual (“Subject 2”):





30. Based on my training and experience, I believe Al-Muhtadi is wearing a red NRB headband, and that Al-Muhtadi and Subject 2 are conducting firearms training in support of the NRB.

31. On or about December 12, 2019, Al-Muhtadi sent another social media user a message containing what appears to be a photograph of an official NRB form on official NRB letterhead, signed with what appears to be Al-Muhtadi's signature.⁶ The form reads:

I, the Comrade: Mahmud Amin Ya'qub Al-Muhtadi...ID# 80345809 pledge to take all legal responsibility for the weapon in my trusteeship, Russian made 1984, serial # PS 20592, Parts# 244597, along with 3 magazines and total of 90 bullets. This weapon is the property of the National Resistance Brigades, and I received it from Comrade Mahmud Amin Al-Muhtadi. I pledge to protect all the aforementioned, and to be committed to all the leadership instructions, and to give it back upon request without delay.

The document is a pledge form from the National Resistance Brigades (NRB). It features the NRB logo and text in both English and Arabic. The English text reads: "National Resistance Brigades, The Army Wing of The Comrades, Fight For Liberation of Palestine". The Arabic text reads: "كتائب المقاومة الوطنية, الجناح العسكري للجبهة الشعبية لتحرير فلسطين, نضالنا من أجل فلسطين". The form contains a pledge from Mahmud Amin Ya'qub Al-Muhtadi, ID# 80345809, regarding a Russian-made weapon (1984, serial # PS 20592, Parts# 244597) and 3 magazines/90 bullets. The document is signed with a signature that appears to be Al-Muhtadi's.

⁶ Based on my review, the signature Al-Muhtadi provided on this form appears to match the signature he provided on his I-130A form in support of his U.S. Visa Application.

32. On or about September 22, 2020, Al-Muhtadi sent another social media user the message “This is my group,” along with the below photograph of a group of militants wearing headbands with the NRB logo.



33. The other social media user responded, “[H]ow many are they[?],” to which Al-Muhtadi responded, “I have 15 young men,” and sent the below photograph of himself (Al-Muhtadi, center) posing with NRB militants.



34. On or about May 27, 2022, a social media user sent Al-Muhtadi the message, “The battalions’ youth are ready,” along with another photograph of Al-Muhtadi with NRB militants.



35. Based on my training and experience, I believe these messages and communications indicate that Al-Muhtadi was sufficiently senior in the NRB to have been tasked with training younger militants.

36. On or about September 26, 2020, Al-Muhtadi received the below photograph on social media of what appears to be two individuals wearing headbands with the NRB logo, sitting at a table with a gun and two computers bearing the NRB logo, with another firearm and two banners with the NRB logo in the background. Al-Muhtadi responded to the message by stating, "This is in our kitchen."



37. On or about November 21, 2020, Al-Muhtadi sent the below photographs of a rocket propelled grenade launcher and grenades and numerous automatic rifles laying on a table to another social media user:



38. The other social media user inquired, "Where is all of this[?]," to which Al-Muhtadi responded, "At home." Al-Muhtadi then sent an additional photograph (below), which appears to depict a rocket propelled grenade launcher and grenades:



39. The other social media user suggested to Al-Muhtadi that they sell the weapons, to which Al-Muhtadi responded, “[Y]ou want them to talk about me and say that I sold the resistance’s weapons.” Based on my training and experience, I believe Al-Muhtadi’s reference to “resistance” refers to the NRB (the National Resistance Brigades).
40. On or about May 11, 2021, Al-Muhtadi sent a message to another social media user describing an NRB attack on a military outpost in Israel, near the Gaza border. Al-Muhtadi commented, “I swear by God, we burned them! This battle is different for us. God is the helper! Long live the resistance.”
41. A review of Al-Muhtadi’s email account revealed at least two photographs of Al-Muhtadi dressed in military gear and holding a rifle. Metadata indicates that these photographs are from November 14, 2021:



Photo 1



Photo 2

42. In Photo 1, Al-Muhtadi is wearing a red headband on top of a hat. The red headband appears to be the NRB's logo. In Photo 2, Al-Muhtadi's tactical vest is labeled with the words "Wahdat al-Nukhba," which I know to mean the Elite Unit.
43. Moreover, as previously noted, law enforcement has identified Subject 1 as a senior leader of the NRB who has previously engaged with Hamas's most senior leadership. Numerous photographs in Al-Muhtadi's accounts show Subject 1 posing with Al-Muhtadi.



44. Further, based on a review of Al-Muhtadi's social media accounts, it appears that Al-Muhtadi frequently shared NRB propaganda in messages with other social media users, as well as updates on NRB and Hamas military operations against Israel.

Al-Muhtadi's Participation in Hamas's October 7, 2023, Attack on Israel

45. On or about August 12, 2025, the United States obtained six audio recordings assessed to be telephone calls made by Al-Muhtadi on October 7, 2023, using telephone number 598824855.⁷

⁷These phone calls list the country code for Al-Muhtadi's '4855 number as 972. Tower data associated with that number provided by the Israeli telecom service Cellcom lists the number's country code as 970. Based on my training and experience and conversations with other law enforcement officers and experts, I know 970 to be the country code

46. Law enforcement has corroborated that the speaker on the calls is Al-Muhtadi and that the calls took place on October 7, 2023. In particular, an FBI agent familiar with Al-Muhtadi's voice ("UC-1") has reviewed the phone calls and confirmed that the speaker on the calls is Al-Muhtadi.⁸ Moreover, Al-Muhtadi is referred to in one of the calls as "Abu Ala"—which translates to "Father of Ala"—which law enforcement has identified as a kunya⁹ used by Al-Muhtadi. Additionally, and as detailed below, multiple references are made in the calls to the then ongoing October 7, 2023, attack, as well as to Israelis celebrating an "eid" the night before, which I understand to be an Arabic term for celebration and a reference to the Jewish holidays Shemini Atzeret and Simchat Torah, celebrated by Israelis starting in the evening of October 6, 2023. As detailed below, Al-Muhtadi also makes references in the calls to the statement put out by Hamas's military leader Deif on the morning of October 7, 2023. Further, images of a business operated by Al-Muhtadi in Gaza (as evidenced by photos and messages in Al-Muhtadi's social media accounts) list the '4855 number for the business. Email records for an account used by Al-Muhtadi's wife (for which law enforcement obtained authorization to search), lists the '4855 number as the contact for "Mahmoud," Al-Muhtadi's first name.

for Palestine, and 972 to be the country code for Israel. I know that there are numerous reasons why Palestinian numbers and/or phones subscribed to Palestinian providers often use the Israeli country code of 972, to include agreements, technical arrangements, and infrastructure. This does not represent two different and distinct numbers, but instead the same number simply recorded differently across networks. Regardless of the country code associated with the '4855 number, I know it to be Al-Muhtadi's phone. Furthermore, Al-Muhtadi's phone number is associated with both country codes in other records. For example, subscriber records for a social media account for Al-Muhtadi's known business in Gaza list the '4855 number's country code as 972; however, in records from Al-Muhtadi's wife's email account the country code for the '4855 number is listed as 970, and associated with "Mahmoud," Al-Muhtadi's first name.

⁸ UC-1 met in person with Al-Muhtadi in Lafayette, Louisiana on approximately six occasions between July 24, 2025 and September 23, 2025. That agent additionally spoke on the phone with Al-Muhtadi on approximately 11 occasions. UC-1 reviewed the six recordings and confirmed that the speaker on those recordings is Al-Muhtadi.

⁹ A "kunya" is a type of epithet or teknonym in an Arabic name. Based on my review of Al-Muhtadi's messages across multiple social media accounts, I am aware that Al-Muhtadi is frequently referred to by the kunya "Abu Ala" in his communications with others.

47. In the calls, as detailed below, Al-Muhtadi described his knowledge of Hamas's attack on Israel; his intention to participate in that attack; his efforts to gather manpower and munitions before crossing the border; his travel towards Israel; his efforts to avoid detection; and his eventual crossing over the border into Israel.
48. Almost immediately after Hamas's attack began, at approximately 6:34 a.m. on October 7, 2023, Al-Muhtadi received a social media message from an individual that read, "I see war." Beginning at approximately 6:36 a.m., that same individual added, "Hell opened its gates. It is very chaotic, and there will be no end, this time. It will end in a good way." At approximately 7:34 a.m., the same individual sent Al-Muhtadi a message reading, "Hilux trucks [vehicles used by Hamas attackers] inside the settlements [Israel]." At approximately 7:58 a.m., the same individual sent Al-Muhtadi a video depicting what appears to be a Hamas paraglider flying towards Israel.
49. As previously noted, at approximately 7:53 a.m., Hamas's military leader, Deif, issued a public statement calling for others to participate in Hamas's terrorist attack on Israel and to follow Hamas's "directives and instructions": "[E]veryone who has a rifle, take it out, as now is the time. And whoever doesn't have a rifle, take out your machete, your axe, your hatchet, your Molotov cocktail, your truck, your bulldozer, or your car."
50. Following Deif's statement, at approximately 8:12 a.m., Al-Muhtadi had a telephone conversation with an unknown male. During the conversation, Al-Muhtadi asked the unknown male to "go pick up the thing, because I might continue east man." The unknown male responded, "We are ready man. And if you want me to go east with you, I'm ready." Al-Muhtadi replied, "Get ready," and, "The borders are open I swear. They are passing by

in the Hilux. Get ready.” Al-Muhtadi instructed the unknown male, “Keep your phone on, so, I can call you when I get there.”

51. Based on my training and experience, I believe that Al-Muhtadi, who was at the time living and working in the Gaza Strip, was informing the unknown male that he (Al-Muhtadi) intended to join the Hamas attack on Israel by “go[ing] east” to cross the Gaza/Israel border which, due to the attack, was now “open.” I am aware that the Hamas attack on Israel started around 6:30 a.m. on the morning of October 7, 2023, and that Hamas’s military leader Deif issued a public statement at approximately 7:53 a.m. calling for others to participate in the attack with Hamas. Al-Muhtadi further referenced individuals “passing by in the Hilux,” which, based on the investigation to date and open-source research, I am aware is a truck utilized by many Hamas terrorists during the October 7, 2023, attack. I believe Al-Muhtadi instructed the unknown male to be “ready” to join him in crossing the border to attack the Israelis.

52. At approximately 8:42 a.m., Al-Muhtadi spoke on the phone with an individual he referred to on the call as “Awni.” During the call, Al-Muhtadi advised Awni to be ready to evacuate. Al-Muhtadi explained, that, “Our guys are celebrating inside [Israel],” adding that, “The best message that Abu Khalid Al-Deif [then-commander of Hamas’s Al Qassam Brigades] delivered to them is that I’m still alive. Still alive [Laughter].” Awni said to Al-Muhtadi, “The Jews are still in shock!” to which Al-Muhtadi replied, “Ah, they still haven’t awakened from the shock. They are still drunk, because it’s the last day of their Eid [the Jewish holidays Shemini Atzeret and Simchat Torah, which began on the evening of October 6, 2023].” Al-Muhtadi noted that “five thousand, six thousand rockets have been fired.”

53. As the call continued, Al-Muhtadi stated: "There is lots of soldiers [Israel Defense Forces soldiers] that have been kidnapped. Yes, it's taking place down there. Yes, there is kidnapping, and it's a game, which will be a good one. It might be the reason to cease fire. Once there is a cease-fire, I will give you two of the dogs I have right away." Al-Muhtadi continued, "Do you know that Al-Qassam [Hamas's military wing] attacked Tel-Aviv before informing the police stations to evacuate, before telling the field control to evacuate. Do you understand? . . . If things go the way they should, Syria will take part, Lebanon will take part . . . and it's going to be a third world war . . . This war will last two months, a month, or it will be a war of attritions. That will be perfect." Later in the call, Al-Muhtadi stated, "Listen! I want to tell you something. Hamas has something planned, but they received instructions from Al-Deif [then-commander of Hamas's Al-Qassam Brigades], Al-Ajuri, and Al-Aluli to begin." Near the end of the call, Al-Muhtadi stated, "What? The guys are calling, I swear by God. They want to go inside [Israel]." Awni responded, "May God protect you! I will go to Israel, Man!"

54. Based on my training and experience, I believe that Al-Muhtadi told Awni to be ready to evacuate his location given the likelihood of reprisals from Israel to Hamas's attack earlier that morning. He further explained that Hamas's Al-Qassam leader Deif had verified that he was still alive, and that Hamas had launched "five thousand, six thousand rockets." As previously noted, following the initial wave of Hamas attackers, at approximately 7:53 a.m., Deif delivered a message encouraging supporters to arm themselves and cross the border to attack Israel. In that message, Deif mentioned that Hamas had fired 5,000 rockets. As such, I believe that Al-Muhtadi had likely heard and was commenting on Deif's call to arms from that day.

55. Further, I believe that, as the call continued, Al-Muhtadi told Awni that Hamas was kidnapping Israeli soldiers, which Al-Muhtadi anticipated would likely lead to a ceasefire during hostage negotiations (“There is lots of soldiers have been kidnapped . . . It might be the reason for ceasing fire.”). Al-Muhtadi told Awni that once there was a ceasefire, he would transfer two of something to Awni, using the code “dogs.”¹⁰ I believe Al-Muhtadi further informed Awni that Al-Qassam, Hamas’s military wing, had started the attack before informing police stations and “field control” in Gaza to evacuate in anticipation of retaliatory attacks from Israel. Al-Muhtadi expressed excitement at the prospect that the attack might lead to a prolonged conflict with Israel (“This war will last two months, a month, or it will be a war of attritions. That will be perfect.”). Al-Muhtadi told Awni that Hamas had received instructions from Deif and others to conduct the attack. Finally, I believe at the end of the call, Al-Muhtadi told Awni that he was receiving a call from individuals who wanted to join in the attack against Israel (“The guys are calling, I swear by God. They want to go inside”). Awni affirmed that was his intention as well (“I will go to Israel, man”).

56. At approximately 8:55 a.m., Al-Muhtadi spoke on the phone with an individual he referred to as “Abu Haytham.” During the call, Al-Muhtadi asked Haytham, “What type of things do you have?” Abu Haytham said he had nothing, to which Al-Muhtadi responded, “Rifles!” Abu Haytham replied, “Yes, but there are no ammunitions. . . There is but, there are no ammunitions.” Al-Muhtadi answered, “Ok, are you ready?” Abu Haytham affirmed that he was. Al-Muhtadi then told him, “Ok, bring the rifles, and whatever you have.”

¹⁰ While I do not know conclusively what Al-Muhtadi meant by “dogs”, I am aware that “dogs” is a pejorative sometimes used for “Jews” or “Israelis”.

57. Based on my training and experience, I believe that Al-Muhtadi asked Abu Haytham to bring him whatever weapons Abu Haytham had in his possession (“Rifles!”) in preparation for Al-Muhtadi to cross the border and participate in the attack.
58. At approximately 9:07 a.m., Al-Muhtadi had a call with an unknown male. During the call, Al-Muhtadi asked, “Did you bring the rifles?” The unknown male affirmed, and asked Al-Muhtadi where he was. Al-Muhtadi responded, “Ok, keep the rifles with you, and bring me the magazine from Hazim.” The unknown male expressed frustration with having to collect the magazine and Al-Muhtadi interrupted him to say, “You need to get closer-closer to me as you can.” The unknown male replied, “Abu Ala [Al-Muhtadi]! I can’t get in while carrying a rifle. I will bring a rifle with me.” Al-Muhtadi instructed the unknown male to, “Go to Tel Al-Hawa [a neighborhood in Gaza] . . . can you? Without letting anyone seeing you. How many rifles do you have?” The unknown male answered, “I have one with full magazine.” Al-Muhtadi instructed, “Ok, go to Al-Dahduh’s house go to Al-Dahduh’s house—go to Tel Al-Hawa—come to Tel Al-Hawa.” The unknown male asked, “Do you have a car?” Al-Muhtadi answered, “Yes, yes, but the car that I have is full.” The unknown male replied, “Ok, where are you throwing me? You know you are putting me in trouble!”
59. Based on my training and experience, I believe Al-Muhtadi was instructing the unknown male to go and collect ammunition from someone named Hazim (“bring me the magazine from Hazim”) and bring it to Al-Muhtadi in the Tel Al-Hawa neighborhood of Gaza. I believe Al-Muhtadi told the unknown male that he had a car filled with people ready to travel into Israel to participate in the invasion (“[T]he car that I have is full”), at which point the unknown male expressed concern that bringing Al-Muhtadi ammunition could get the unknown male into trouble. During the call, the unknown male referred to Al-

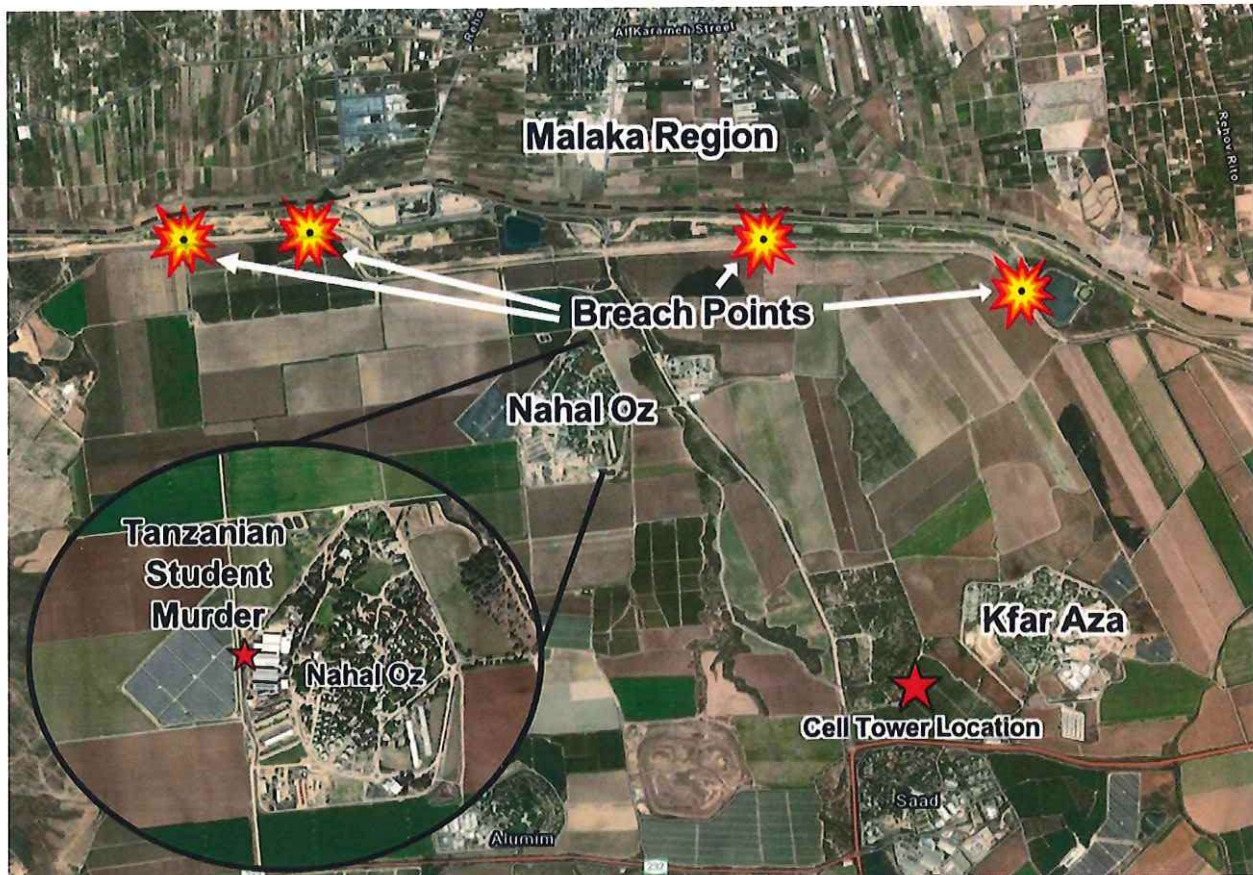
Muhtadi as “Abu Ala,” which law enforcement has identified as a kunya used by Al-Muhtadi.

60. At approximately 9:10 a.m., Al-Muhtadi had a call with another unknown male. During the call, Al-Muhtadi told the unknown male that he (Al-Muhtadi) was in “Ruqayah Al-Almi” and told the unknown male, “If you have a full magazine, bring it to me . . . and if you have a vest, bring it to Hani.” The unknown male told Al-Muhtadi, “We have vests.” Al-Muhtadi responded, “Ok then, move and hurry up. Meet us by the door.”
61. Based on my training and experience, I believe Al-Muhtadi was instructing the unknown male to bring him ammunition, as well as a bullet proof vest for one of Al-Muhtadi’s fellow militants.
62. As previously noted, at approximately 9:13 a.m., the NRB posted online that it had infiltrated Israel alongside the military wings of other resistance factions.
63. At approximately 9:33 a.m., Al-Muhtadi had another call with an unknown male. Al-Muhtadi began the call by stating, “Be careful, don’t mention Al-Qassam! . . . No one mentions Al-Qassam, boys.” Someone in the background can be heard saying, “Inside, inside, inside.” Al-Muhtadi subsequently stated, “I went inside [Israel] . . . come here.” The individual in the background warns, “Don’t! — on the cell phone.” Al-Muhtadi said, “I swear by God, I’m inside. Turn your phones off, boys.” The unknown male asks Al-Muhtadi where he should come, to which Al-Muhtadi replies, “At Malaka’s, inside. At Malaka’s, inside . . . Come in boys!” The unknown male asked, “Do you have extra, ammunitions and things?” Al-Muhtadi answered, “Yes, yes man. Yes. Yes.” The unknown male responded, “So, I will come to you empty [unarmed]. I have nothing.” Al-Muhtadi replied, “Just come, but if you can, secure a motorcycle to use it, in order to come inside?”

The unknown male affirmed and asked how to get in touch with Al-Muhtadi. Al-Muhtadi told him to call him on the phone he (Al-Muhtadi) was using.

64. Based on my training and experience, I believe that the call started with Al-Muhtadi instructing the other attackers with him and/or the unknown male on the phone not to use the words “Al-Qassam [Hamas’s military wing],” in case the call was being monitored by Israel. He similarly instructed the other attackers with him to be sure to turn off their phones. I believe Al-Muhtadi then informed the unknown male that he was currently inside the Israel border, and further confirmed that he had sufficient ammunition.
65. Al-Muhtadi told the unknown male to obtain a motorcycle and join Al-Muhtadi in Israel (“inside”) to assist with the attack. Al-Muhtadi indicated that he was “at Malaka’s inside,” which I believe to be a reference to the Malaka region in Gaza, which, based on the investigation to date, I know abuts the border with Israel and encompasses the site of multiple breach points that Hamas and its supporters used to infiltrate Israel on October 7, 2023.
66. That Al-Muhtadi crossed into Israel through a breach point in the Malaka region is consistent with the other evidence about the NRB and Al-Muhtadi’s actions on October 7, 2023. As previously detailed, at least one individual wearing an NRB patch was captured on film outside Nahal Oz—a kibbutz in Israel near the border fence abutting the Malaka region in Gaza—murdering a Tanzanian student who had been kidnapped from the Kibbutz. The Malaka region is also near Kibbutz Kfar Aza and the cell tower that Al-Muhtadi’s phone connected to approximately 30 minutes after this 9:33 a.m. phone call. Further, as described above, the NRB issued a statement at 9:13 a.m. on October 7, 2023 that it had infiltrated Israel (alongside other resistance factions) and, on another statement

on October 8, 2023, claiming that its fighters were specifically involved in the assault on Kfar Aza.



67. Accordingly, I believe that, on the call, Al-Muhtadi was instructing the unknown male that he (Al-Muhtadi) had entered Israel through a breach point in the Malaka region and advised the unknown male to get a motorcycle to do the same.

Phone Location Information Shows that Al-Muhtadi was in the Vicinity of Kfar Aza During the October 7, 2023, Attack

68. As noted above, based on data obtained from Israeli cell provider Cellcom, at approximately 10:01 a.m. on October 7, 2023, Al-Muhtadi's phone using telephone number 598824855 connected to an Israeli tower operated by Cellcom located nearby Kibbutz Kfar Aza.

69. Based on my training and experience, and my discussion with law enforcement subject-matter experts, I know that when a cell phone is powered on, it is constantly scanning its environment searching for the cell tower that will provide the best signal and optimal service. Cell phones are designed to prioritize their home network, and cell towers in that home network, over any other cellular carrier. This decision-making process is dictated by the SIM card inserted into a phone. If a cell phone is in a geographic area outside the coverage area of any cell towers in its home network, the phone will then attempt to roam on another cellular network that provides service in that location. Roaming is considered a last resort for a device, as it incurs charges for the home network that are typically passed along to the customer. If a phone sees any serviceable signal from towers in its home network, it will attempt to connect to those towers and not choose to roam on another network.

70. Based on the International Mobile Subscriber Identifier (IMSI) tied to his '4855 phone number, Al-Muhtadi's phone's home network was the Gaza-based cell carrier Jawwal.¹¹ Based on evidence provided by the Israeli telecom service Cellcom, at 10:01 a.m., Al-Muhtadi's phone utilized the west-facing sector of an Israeli-based Cellcom cell tower located at the coordinates 31.475310, 34.528825 which is approximately 1.9 miles east of the border and 0.4 miles from Kfar Aza.

71. Since Al-Muhtadi's phone connected to this specific cell tower for its call, it appears that the phone was roaming on the Cellcom network at this time, was within the coverage area of this tower, and identified this specific tower as the best available out of all options, to

¹¹ The first digits in an IMSI identify the home country and network for a phone number. Al-Muhtadi's IMSI began with 42505 which correlates to the Jawwal network meaning his phone would prioritize connecting with any Jawwal cell tower before roaming on another network.

include any cell towers located in Gaza. Importantly, this indicates that there were no Jawwal cell towers providing serviceable coverage to Al-Muhtadi's phone at 10:01 a.m., when the phone connected to the Cellcom tower near Kfar Aza in Israel.

72. Based on my training and experience and open-source research, I believe that Jawwal—one of the largest mobile carriers in Gaza—would likely have cell towers throughout Gaza so that a phone located anywhere in Gaza would be able to utilize their network, including along the border. I further believe that Al-Muhtadi's phone instead connecting with the Kfar Aza Cellcom tower is indicative of Al-Muhtadi's phone being physically located somewhere in Israel in the coverage area of the Kfar Aza tower at 10:01 a.m., when it connected to the network.

73. This is also consistent with the other previously described evidence related to Al-Muhtadi and DFLP's presence in the area of the Kfar Aza tower during the October 7, 2023, attack: namely, Al-Muhtadi's recorded statement at 9:33 a.m. that he was "inside" and at "Malaka's," video of a DFLP member murdering a Tanzanian agricultural student outside of nearby Kibbutz Nahal Oz, and DFLP's statement that it was involved in the attack on Kibbutz Kfar Aza.

Al-Muhtadi's False Visa Application and Immigration to the United States

74. According to U.S. Department of State ("USDOS") records, on June 26, 2024, an individual named "Mahmoud Almuhtadi" electronically signed and submitted a USDOS form DS-260 ("the DS-260"), an Immigrant Visa Application. On the DS-260, Al-Muhtadi indicated he was born in Gaza on November 2, 1991, lived in Gaza until March 2024, and resided in Cairo, Egypt at the time he filled out the application. Al-Muhtadi indicated that his wife assisted him in filling out the application. Al-Muhtadi signed and submitted

the form, at which time he acknowledged that the submission of any false statements “may result in the permanent refusal of a visa or the denial of entry into the United States. All declarations made in this form are unsworn declarations made under penalty of perjury (28 U.S.C. 1746).” The form further advised that Al-Muhtadi would be required to swear to the statements in his application at the time of his interview. Al-Muhtadi’s visa application included the following representations:

- Al-Muhtadi indicated he did not have any specialized skills or training, including firearms, explosives, nuclear, biological, or chemical experience.
- Al-Muhtadi indicated he had not ever served in, been a member of, or been involved with a paramilitary unit, vigilante unit, rebel group, guerrilla group, or insurgent organization.
- Al-Muhtadi indicated he did not seek to engage in terrorist activities while in the United States, nor had he ever engaged in terrorist activities.
- Al-Muhtadi indicated he had never intended to provide financial assistance or other support to terrorists or terrorist organizations.
- Al-Muhtadi indicated he was not a member or representative of a terrorist organization.
- Al-Muhtadi indicated he had not committed, ordered, incited, assisted, or otherwise participated in extrajudicial killings, political killings, or other acts of violence.
- Al-Muhtadi indicated he spoke and/or read English.

75. On August 6, 2024, Al-Muhtadi met with a consular official at the U.S. Embassy in Cairo.

The consular official did not recall meeting Al-Muhtadi specifically, but said she would have administered an oath to Al-Muhtadi in whatever language he would have been most comfortable speaking, whether English or Arabic, requiring him to swear that the answers he provided in his application were true. The official said that Al-Muhtadi would have answered in the affirmative and provided his fingerprints. Law enforcement has obtained a copy of those fingerprints. The consular official’s notes from her meeting with Al-

Muhtadi state, "Oath taken and FPs [fingerprints] verified." Al-Muhtadi provided his photograph on various parts of the application package.

76. Based on the documentation, review of his social media accounts, and other information provided by Israel, Al-Muhtadi swore to the accuracy of numerous materially false statements in his visa application, in violation of 18 U.S.C. § 1546, with respect to at least his affiliation with DFLP, the NRB, and Hamas, his training, and his involvement in the October 7, 2023, attacks.

Al-Muhtadi Entered the United States and Lives in Lafayette, Louisiana

77. On his DS-260 form, Al-Muhtadi indicated he intended to live in Tulsa, Oklahoma, and work in "car repairs or food services." According to United States Department of Homeland Security, Customs and Border Protection ("USCBP") records, Al-Muhtadi entered the United States on September 12, 2024, via Dallas Fort Worth International Airport. A photograph of Al-Muhtadi was taken upon entry.
78. On September 18, 2024, a social media user sent Al-Muhtadi messages advising him, "Listen, I want to tell you something, no need to go to the resistance guys [National Resistance Brigades]. . . . Because you are now under surveillance for everything." Al-Muhtadi responded arguing that now that he was in America, he could post anything he wanted: "If you post Al-Sinwar's [former Hamas leader Yahya Al-Sinwar] picture, no one will tell you anything." The other user responded, "No, that is considered terrorism to them." Al-Muhtadi replied, "No, it's okay, I was thinking the same way." Based on my training and experience, I believe Al-Muhtadi was telling the other user that he agreed that he should not reach out to DFLP or post publicly about Hamas now that he was in the United States.

79. On May 19, 2025, a search in the National Crime Information Center (“NCIC”) database returned an Oklahoma state driver’s license for “Mahmoud A Y Almuhtadi,” date of birth November 2, 1991, with an address in Tulsa, Oklahoma. The record included a photograph which depicted Al-Muhtadi. Physical surveillance subsequently confirmed that Al-Muhtadi was residing in Tulsa as of May 2025.

80. On February 20, 2025, Al-Muhtadi shared a photograph in a social media message that appears to depict a Glock 26 9-millimeter firearm:





81. The Glock logo and a serial number, BRBW646, are visible in the first image. What appear to be seven, nine-millimeter rounds and a partially loaded magazine are visible in the second image. In the third, Al-Muhtadi is readily identifiable, standing in what appears to be a bedroom in his Tulsa apartment and loading the magazine into what appears to be the same gun.¹² Additional photographs show what appear to be Al-Muhtadi's children handling and posing with what appears to be the same gun.

¹² An individual familiar with Al-Muhtadi's apartment in Tulsa, Oklahoma, reported with high confidence that various pictures involving the firearm were taken in Al-Muhtadi's apartment. The individual who reviewed the images recognized the sliding glass doors and trim from the apartment.

82. In early June 2025, FBI agents located Al-Muhtadi in Lafayette, Louisiana. Based on physical surveillance, he appeared to be residing in Lafayette and working at a local restaurant.

83. As of September 24, 2025, law enforcement surveillance has observed Al-Muhtadi continuing to reside and work in Lafayette, Louisiana.

Conclusion

84. As detailed above, Al-Muhtadi is a DFLP operative who, on the morning of October 7, 2023, learned about the Hamas invasion, heard Hamas's call to arms, armed himself, gathered others, and crossed into Israel with the intent to assist in Hamas's terrorist attack. Evidence further shows that Al-Muhtadi provided false information in his U.S. Visa application relating to his involvement with a paramilitary organization, connection to NRB, connection to Hamas, participation in a terrorist attack, and military training.

85. Based upon the facts set forth above, your affiant believes that probable cause exists to show that Mahmoud Amin Ya'qub Al-Muhtadi violated Title 18 United States Code § 2339B and 18 United States Code § 1546(a). Due to these facts, I request an arrest warrant be issued for Mahmoud Amin Ya'qub Al-Muhtadi.

86. The United States further requests that the Court order that this complaint, warrant and any resulting order be sealed until further order of the Court. As explained above, these documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these

documents because their premature disclosure may seriously jeopardize that investigation, result in destruction of evidence or allow the target of the investigation to flee.

87. I declare that the information provided above is true and correct to the best of my knowledge and belief.

Respectfully Submitted,



Alexandria M. Thoman O'Donnell
Supervisory Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO before me this 6th day of October 2025 in Lafayette,
Louisiana.



HONORABLE DAVID J. AYO
UNITED STATES MAGISTRATE JUDGE