

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

26 MAG 1622

UNITED STATES OF AMERICA

v.

MOHAMMAD BAQER SAAD DAWOOD
AL-SAADI,

Defendant.

COMPLAINT

Violations of 18 U.S.C. §§ 844, 2332f,
2339A, 2339B & 3238

SOUTHERN DISTRICT OF NEW YORK, ss.:

Kathryn McDonald, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Conspiracy to Provide Material Support to a Foreign Terrorist Organization)

1. From at least in or about 2017, up to and including the date of this Complaint, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to a foreign terrorist organization, namely, Kata'ib Hizballah, which was designated by the U.S. Secretary of State as a foreign terrorist organization ("FTO") on or about July 2, 2009, and is currently designated as such as of the date of the filing of this Complaint.

2. It was a part and an object of the conspiracy that MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, would and did knowingly provide Kata'ib Hizballah with material support and resources, including property, services, lodging, weapons, personnel, and transportation, knowing that Kata'ib Hizballah was a designated terrorist organizations (as defined in Title 18, United States Code, Section 2339B(g)(6)), that Kata'ib Hizballah has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that Kata'ib Hizballah engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(C), (d)(1)(D), (d)(1)(E), and (d)(1)(F), and 3238.)

COUNT TWO

(Conspiracy to Provide Material Support to a Foreign Terrorist Organization)

3. From at least in or about 2019, up to and including the date of this Complaint, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to a FTO, namely, the Islamic Revolutionary Guard Corps (“IRGC”), which was designated by the U.S. Secretary of State as a foreign terrorist organization on or about April 15, 2019, and is currently designated as such as of the date of the filing of this Complaint.

4. It was a part and an object of the conspiracy that MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, and others known and unknown, would and did knowingly provide the IRGC with material support and resources, including property, services, lodging, weapons, personnel, training, facilities, explosives, and transportation, knowing that the IRGC was a designated terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that the IRGC engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that the IRGC engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(C), (d)(1)(D), (d)(1)(E), and (d)(1)(F), and 3238.)

COUNT THREE

(Conspiracy to Provide Material Support for Acts of Terrorism)

5. From at least on or about February 28, 2026, up to and including the date of this Complaint, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including property, services, lodging, weapons, personnel, training, facilities, explosives, and transportation, knowing and intending that they were to be used in preparation for and in carrying out one or more of the following violations of Title 18, United States Code: (a) attempting and conspiring to murder nationals of the United States, in violation of Title 18, United States Code, Section 2332(b), and (b) bombing and conspiring to bomb a place of public use, in violation of Title 18, United States Code, Section 2332f.

(Title 18, United States Code, Sections 2339A and 3238.)

COUNT FOUR
(Provision of Material Support for Acts of Terrorism)

6. From at least on or about February 28, 2026, up to and including the date of this Complaint, in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally provided and attempted to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including, among other things, property, services, lodging, weapons, personnel, training, facilities, explosives, and transportation, knowing and intending that they were to be used in preparation for and in carrying out one or more of the following violations of Title 18, United States Code: (a) attempting and conspiring to murder nationals of the United States, in violation of Title 18, United States Code, Section 2332(b) and (b) bombing and conspiring to bomb a place of public use, in violation of Title 18, United States Code, Section 2332f.

(Title 18, United States Code, Sections 2339A, 2, and 3238.)

COUNT FIVE
(Conspiracy to Bomb a Place of Public Use)

7. From at least in or about March 2026 through in or about April 2026, in the Southern District of New York and elsewhere, MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other unlawfully to deliver, place, discharge, and detonate an explosive and other lethal device in, into, and against a place of public use, a government facility, a public transportation system, and an infrastructure facility, with the intent to cause death and serious bodily injury, and with the intent to cause extensive destruction of such a place, facility, and system, and where such destruction resulted in and was likely to result in major economic loss, and where the offense took place both inside and outside the United States and (i) the offense was committed in an attempt to compel the United States to do or abstain from doing any act, and (ii) a victim of the offense was a national of the United States.

Overt Acts

8. In furtherance of the conspiracy and to effect the illegal object thereof, MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, and his co-conspirators, committed and caused to be committed the following attack and attempted attacks, to compel the United States to stop military attacks against Iran and the Islamic Revolutionary Guard Corps: on or about March 15, 2026, AL-SAAD and others carried out an attack involving explosives against the Bank of New York Mellon building in Amsterdam, Netherlands; on or about March 28, 2026, AL-SAAD and others attempted to attack the Bank of America building in Paris, France, using an improvised explosive device; in or about early April 2026, AL-SAAD and others attempted to carry out a terrorist attack against Jewish institutions in the United States; and on or about April 29, 2026, AL-SAAD and others stabbed and seriously injured two individuals, including a U.S. citizen, in London, United Kingdom.

(Title 18, United States Code, Sections 2332f(a), (b)(1)(B), (b)(2)(B), (b)(2)(D), and 3238.)

COUNT SIX

(Destruction of Property by Means of Fire or Explosive)

9. In or about early April 2026, in the Southern District of New York and elsewhere, MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, willfully and knowingly did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, a building, vehicle, and other real and personal property used in interstate and foreign commerce, and in any activity affecting interstate and foreign commerce, to wit, in or about early April 2026, AL-SAADI attempted to attack numerous Jewish sites in the United States, including by means of fire and an explosive.

(Title 18, United States Code, Sections 844(i), 2, and 3238.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

10. I am a Special Agent with the FBI, assigned to investigate counterterrorism matters, including counterterrorism investigations involving crimes against the United States and U.S. citizens occurring outside the United States. Based on my training and experience, I have become knowledgeable about criminal activity, particularly violations of the federal terrorism statutes. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers and other individuals, and upon my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses cited above, it does not include all the facts that I have learned during the course of the investigation. Where the contents of conversations with others and statements by others are reported herein, they are reported in substance and in part, except where otherwise indicated.¹

Overview

11. MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, is an Iraqi citizen and a commander for Kata'ib Hizballah, a U.S. designated FTO operating in Iraq that is closely aligned with the IRGC, which is also a U.S. designated FTO. AL-SAADI has been a member of Kata'ib Hizballah and has furthered the terrorist goals of that group and the IRGC since at least in or about 2017.

¹ Some of the information recounted below is based on draft translations of statements in Arabic, which are subject to revision. I have also indicated my interpretation of certain words or phrases in brackets, which interpretations are based on the context in which they appear as well as, among other things, my training and experience. To the extent there are grammatical, typographical, or spelling errors in any quotations in this affidavit, those errors appear in the original quoted material unless otherwise indicated.

12. Since the onset of the U.S. and Israeli military conflict with Iran that began on or about February 28, 2026 (the “Iranian Military Conflict”), MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, has directed and urged others to attack U.S. and Israeli interests, including by killing Americans and Jews, in retaliation for the Iranian Military Conflict and to further the terrorist goals of Kata’ib Hezbollah and the IRGC. AL-SAAD and his associates have planned, coordinated, and claimed responsibility for at least 18 terrorist attacks in Europe (the “European Terrorist Attacks”) as well as two additional attacks in Canada, in the name of Harakat Ashab al-Yamin al-Islamiya, a component of Kata’ib Hezbollah. In addition, AL-SAAD, on behalf of Kata’ib Hezbollah and the IRGC, has directed others and attempted to coordinate terrorist attacks in the United States, including in New York, New York.

The IRGC and Kata’ib Hezbollah

13. Based on my conversations with other law enforcement agents, my participation in this investigation, my review of documents, and my training and experience, I have learned, in substance and part, the following:

a. The IRGC is an Iranian military and counterintelligence agency under the authority of Iran’s Supreme Leader. The IRGC is composed of ground, naval, and air forces, as well as other components, including the IRGC Qods Force (“IRGC-QF”), which is also a U.S. designated FTO. The IRGC-QF is the IRGC’s external operations force and is the Government of Iran’s primary arm for executing its policy of supporting terrorist and insurgent groups. The IRGC-QF provides materials, logistical assistance, training, and financial support to militias and terrorist operatives throughout the Middle East and South Asia.

b. On or about October 25, 2007, the U.S. Department of the Treasury (“Treasury”), Office of Foreign Assets Control (“OFAC”), designated the IRGC-QF under Executive Order 13224 for providing lethal support to several terrorist organizations, including Lebanese Hezbollah, Hamas, Palestinian Islamic Jihad, and the Taliban.² According to OFAC, “[t]he Government of Iran . . . uses the [IRGC] and IRGC-QF to implement its foreign policy goals, including, but not limited to, seemingly legitimate activities that provide cover for intelligence operations and support to terrorist and insurgent groups.” On or about October 13, 2017, OFAC further designated the IRGC as a Specially Designated Global Terrorist under Executive Order 13324 for its role in supporting Iran’s involvement in international terrorism and particularly the terrorist activities of the IRGC-QF. In its announcement, OFAC noted that the IRGC “has played a central role to Iran becoming the world’s foremost state sponsor of terror” and highlighted the IRGC’s support for “the lethal activities of Hezbollah, Hamas, and other terrorist groups.” Finally, on or about April 15, 2019, the U.S. Department of State designated the IRGC, including the IRGC-QF, as an FTO under Section 219 of the Immigration and Nationality Act. In announcing the designation, the State Department noted³:

² Also on or about October 25, 2007, the U.S. Department of Treasury designated Qasem Soleimani, a senior IRGC official, as a Specially Designated National (“SDN”) under Executive Order 13382. From in or about 1998 until his death in or about January 2020, Soleimani served as the commander of the IRGC-QF.

³ On or about June 24, 2019, OFAC designated Iran’s then-Supreme Leader, Ayatollah Ali Khamenei.

The IRGC FTO designation highlights that Iran is an outlaw regime that uses terrorism as a key tool of statecraft and that the IRGC, part of Iran’s official military, has engaged in terrorist activity or terrorism since its inception 40 years ago. The IRGC has been directly involved in terrorist plotting; its support for terrorism is foundational and institutional, and it has killed U.S. citizens.

c. Indeed, the IRGC—through the IRGC-QF—has supported the lethal activities of Kata’ib Hizballah, Hizballah, and other terrorist groups. Among its activities, the IRGC plots and conducts attack operations outside Iran targeting, among others, U.S. citizens residing abroad and in the United States. The IRGC has publicly stated its desire and intention to conduct operations targeting those perceived to be enemies of the Iranian regime, including Americans. Iran and the IRGC use other terrorist and paramilitary proxies in the region to take lethal action and to carry out operations against the United States and its allies. These proxies include Kata’ib Hizballah and other Iran-aligned militia groups based in Iraq, as well as Hizballah, which receive training, funding, and weapons from the IRGC. The IRGC and IRGC-QF remain designated FTOs as of the date of the filing of this Complaint.

d. Kata’ib Hizballah is an Iraq-based terrorist group whose goal is to establish an Iran-aligned government in Iraq, expel American forces from Iraq, and advance the regional and international interests of Iran in Iraq and the region. Kata’ib Hizballah has received extensive training, funding, logistical support, weapons, and intelligence from the IRGC-QF. On or about July 2, 2009, OFAC designated Kata’ib Hizballah (and Other Aliases) as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under Executive Order 13224, for threatening the peace and stability of Iraq and the Government of Iraq. In so announcing, OFAC explained that the IRGC-QF—then led by Qasem Soleimani—“provides lethal support to Kata’ib Hizballah and other Iraqi Shia militia groups who target and kill Coalition and Iraqi Security Forces.” Kata’ib Hizballah remains a designated FTO. Its official flag with its logo is shown below:



e. Hizballah is a Lebanon-based Shia Islamic terrorist organization founded in the early 1980s with support from Iran. It is closely related to Kata’ib Hizballah: both groups are part of Iran’s “Axis of Resistance”—that is, the term used for Iran’s efforts, dating back to the 1979 Islamic Revolution and taken forward by the IRGC-QF, to engage proxies, such as Kata’ib Hizballah and Hizballah, to fight on behalf of Iran in return for funding, arms, military

training, and intelligence support—and share the same terrorist ideology and goals. On or about October 8, 1997, the U.S. Department of State designated Hizballah as an FTO under Section 219 of the Immigration and Nationality Act. On or about October 31, 2001, the U.S. Department of State designated Hizballah as a Specially Designated Global Terrorist under Executive Order 13224. Hizballah remains a designated FTO. Its official flag with its logo is shown below:



f. On or about January 3, 2020, during President Donald J. Trump’s first term, Soleimani, the longtime Commander of the IRGC-QF, was killed in a U.S. military operation in Baghdad, Iraq. Iran has repeatedly vowed to avenge Soleimani’s death. For example, in or about January 2023, during events marking the third anniversary of Soleimani’s death, a number of senior government officials in Iran reiterated that they were fully committed to their promise of “harsh revenge” for the killing. According to news reports, then-President of Iran, Ebrahim Raisi, speaking to a large audience in Tehran, Iran, stated, in sum and substance, “We have not and will not forget the blood of martyr Soleimani. The Americans must know that revenge for martyr Soleimani’s blood is certain, and the murderers and perpetrators will have no easy sleep.” Also in or about January 2023, the Iranian judiciary publicly claimed that it had identified 154 purported “suspects” in the case of Soleimani’s assassination, including 96 U.S. citizens, one of whom was President Trump, and that it had requested “red notices” from Interpol for, among others, President Trump. As set forth below, MOHAMMAD BAQER SAAD DAWOOD AL-SAAD, the defendant, has pledged retribution on Americans for the death of Soleimani. *See infra* ¶ 14(c).

g. In or about June 2025, the United States and Israel carried out an air campaign against Iran’s nuclear infrastructure, missile forces, and senior military leadership. The United States bombed certain of Iran’s nuclear missile sites in an effort to prevent Iran from obtaining a nuclear weapon. Iran retaliated by launching missile and drone strikes at numerous military and civilian targets in Israel, and by firing missiles at a U.S. military base in Qatar. Twelve days after the opening strike, a ceasefire took effect.

h. On or about February 28, 2026, the United States and Israel launched a large-scale military attack against Iran—the “Iranian Military Conflict” defined above. Iran’s Supreme Leader Ayatollah Ali Khamenei was killed in the initial strikes. Iran then launched attacks against Israel and U.S. military facilities in the region, as well as energy, infrastructure, and other civilian targets in the Gulf states, including Bahrain, Kuwait, Qatar, Saudi Arabia, UAE, Jordan, and Iraq.

i. In addition to direct attacks, as part of its offensive against the United States and Israel, Iran and the IRGC have also attacked U.S. and Israeli interests through IRGC proxies around the world, including Hizballah and Kata'ib Hizballah. For example, Hizballah has fired thousands of rockets and drone attacks into Israel. Moreover, as discussed in greater detail below, since the onset of the Iranian Military Conflict on or about February 28, 2026, Kata'ib Hizballah, through a purportedly new terrorist group using the pseudonym Harakat Ashab al-Yamin al-Islamiya, has carried out numerous terrorist attacks in Europe against U.S. and Israeli interests.

j. Harakat Ashab al-Yamin al-Islamiya is, in fact, a front of Kata'ib Hizballah, designed to carry out and further the terrorist goals of Kata'ib Hizballah, Hizballah, and the IRGC. Harakat Ashab al-Yamin al-Islamiya first emerged in or about March 2026, almost immediately after the Iranian Military Conflict began. In an effort to portray itself as independent from any designated FTOs, such as Kata'ib Hizballah, the IRGC, or Hizballah, Harakat Ashab al-Yamin al-Islamiya created its own logo and issued its own founding statement. Both the logo and founding statement, however, underscore that Harakat Ashab al-Yamin al-Islamiya is merely a component of Kata'ib Hizballah. The founding statement, for example, was broadcast on well-known media channels in the Shi'ite militant community, which Kata'ib Hizballah, Hizballah, and the IRGC regularly use to disseminate propaganda and information. The logo for Harakat Ashab al-Yamin al-Islamiya, two images of which are shown below, is strikingly similar to Kata'ib Hizballah's and Hizballah's official logos (shown above, *see supra* ¶¶ 13(d), (e)):



k. Essentially overnight, Harakat Ashab al-Yamin al-Islamiya was able to activate terrorist cells across Europe to carry out nearly 20 attacks in the weeks immediately following the start of the Iranian Military Conflict. In doing so, Harakat Ashab al-Yamin al-Islamiya relied on using an already well-established media and ideological infrastructure, as reflected by the number and nature of those attacks, the group's propaganda videos of those attacks (discussed in greater detail below, *see infra* ¶ 15) and the group's use of well-known media channels for Kata'ib Hizballah, Hizballah, and the IRGC. Finally, as discussed in greater detail below, AL-SAADi's involvement in and promotion of the terrorist attacks carried out by Harakat Ashab al-Yamin al-Islamiya further underscore that this group is part of Kata'ib Hizballah.

MOHAMMAD BAQER SAAD DAWOOD AL-SAAD I

14. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of video recordings, documents, and publicly available information, and my training and experience, I have learned, among other things, the following:

a. MOHAMMAD BAQER SAAD DAWOOD AL-SAAD I, the defendant, is a high-level member of Kata'ib Hizballah, who also has close ties to the IRGC and Hizballah. AL-SAAD I worked closely and otherwise interacted in person with Soleimani as well as Abu Mahdi al-Muhandis, who was the leader of Kata'ib Hizballah until he was killed in the same U.S. airstrike as Soleimani in or about 2020. AL-SAAD I also has relationships with other U.S.-designated terrorist leaders, including Esmail Qaani, Soleimani's successor as the commander of IRGC-QF; Akram 'Abbas al-Kabi, the Secretary General of Harakat al-Nujaba; and Naim Qassem, the Secretary General of Hizballah.

b. AL-SAAD I has certain social media accounts that he uses to promote the terrorist agendas of Kata'ib Hizballah and the IRGC, including a Snapchat account with the username @baqir81950 (the "AL-SAAD I Snapchat Account"); a Telegram account with the username @MOHAMMED_BAQER1993 (the "AL-SAAD I Telegram Account"); and an X account with the username @bakr81950 and profile name Mohammed Baqir Saad al-Saadi (the "AL-SAAD I X Account"). The profile pictures of the AL-SAAD I X Account and the AL-SAAD I Telegram Account show photographs of an individual I recognize, from my involvement in this investigation, to be AL-SAAD I, together with Soleimani, the commander of the IRGC-QF until his death in or about January 2020 by a U.S. airstrike in Iraq. Below is a copy of the profile of the AL-SAAD I X Account, featuring a photo of AL-SAAD I on the left and Soleimani on the right:



In addition, below are photographs from the AL-SAADI Snapchat Account of AL-SAADI with Soleimani, including at what appears to be a military-related facility containing maps and other equipment, versions of which AL-SAADI circulated at various times in messages on Snapchat, ranging from in or about 2017 to 2023, including on or about January 3, 2020, around the time of Soleimani's death; the fourth photograph shown below also depicts an individual who appears to be Akram 'Abbas al-Kabi, who as noted above, is a U.S.-designated terrorist who is considered to be one of the main operatives in Iraq of the IRGC-QF:



c. AL-SAADI also has pledged retribution on Americans for the deaths of Soleimani and al-Muhandis, including on his social media accounts. For example:

i. On or about July 2, 2020, AL-SAADI published on the AL-SAADI X Account the following image of the U.S. capital in rubble projected against the faces of Soleimani and al-Muhandis, with the text “our revenge for the martyred leaders is ongoing. No negotiations with the occupier.”



ii. On or about August 2, 2020, AL-SAAD I published on the AL-SAAD I X Account the following image of a militant sitting next to an AK-47 rifle and holding a picture of Soleimani and al-Muhandis, with the caption “I will leave social media and turn off all my phones until the American enemy is defeated [--] victory or martyrdom.”



iii. On or about September 17, 2020, AL-SAAD I sent others via Snapchat an image of President Trump with a target symbol on his face, accompanied by Arabic text that translates to “The Islamic Republic of Iran will never forget the assassination of Martyr General Qassem Soleimani and will inevitably deliver a similar blow to the Americans.”

iv. On or about February 2, 2021, AL-SAAD I published on the AL-SAAD I X Account the following image of U.S. troops being killed or injured in battle, with the caption “The Revenge”:

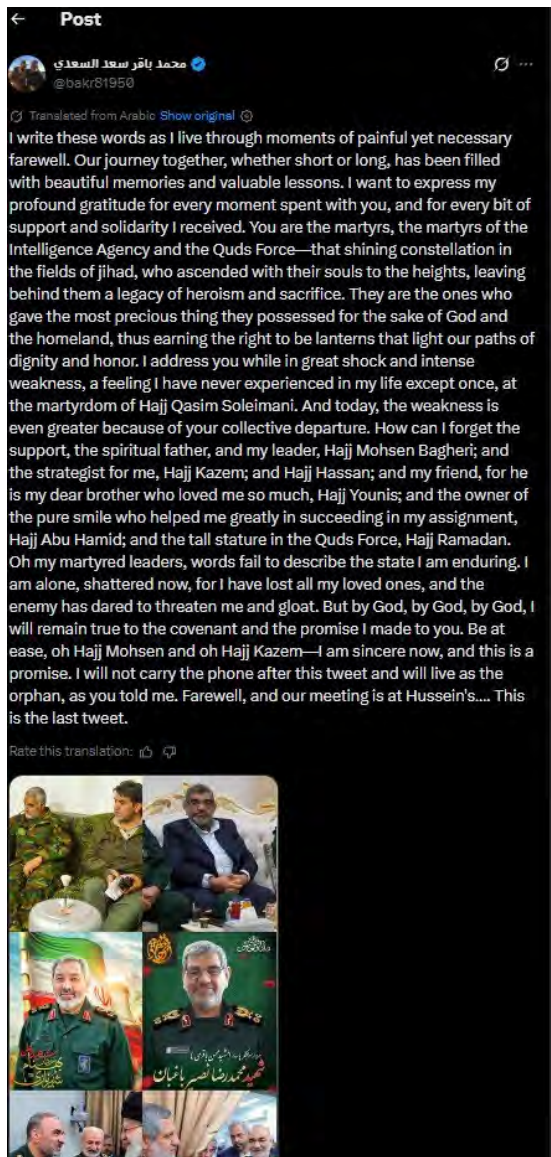


v. On or about April 21, 2021, AL-SAADI posted the following photograph on the AL-SAADI X Account of himself and Soleimani accompanied by captions that read, among other things, in English, “en [sic] entire world will avenge you,” and in Arabic, “In just one night, the Axis of Resistance blows up an Israeli weapons factory, then bombs the Saudis with surface-to-air missiles, then bombs the Dimona reactor, and concludes with Samad drones bombing King Khalid Air Base . . . An eye for an eye, a tooth for a tooth, and coming to Washington and Florida.”



vi. On or about January 2, 2023, AL-SAADY posted on the AL-SAADY X Account an image of President Trump playing golf and the shadow of what appears to be a B-2 bomber hovering over him, with the text, “retribution must be exacted from the instigators and killers of Martyr Soleimani.”

vii. On or about July 1, 2025, AL-SAADY posted on the AL-SAADY X Account the following photographs of high-ranking members of the IRGC in uniform, with a caption (originally in Arabic) reading, among other things, “[y]ou are the martyrs, the martyrs of the Intelligence Agency and the Quds Force—that shining constellation in the fields of Jihad.” In this post, AL-SAADY also described Soleimani’s death as “martyrdom,” and honored certain IRGC officials who helped AL-SAADY succeed in his “assignment.”



d. Since the start of the Iranian Military Conflict, AL-SAADY has publicly called on others to attack American and Israeli interests, and to kill Americans and Israelis. For example:

i. On or about February 28, 2026—that is, the day that the Iranian Military Conflict began—AL-SAAD I posted on the AL-SAAD I Telegram Account a message in Arabic, which read in part, “Do not abandon the blood of your Imam of the time, oh Shiites of Iraq. Kill everyone who supports America and Israel. Do not leave any of them remaining. Civil and military targets, as well as voices of discord, kill them everywhere.”

ii. That same day, AL-SAAD I also posted on the AL-SAAD I X Account a call to arms to attack Americans and Jews. The message, which was posted in Arabic, stated, among other things: “every individual or group capable of killing an American or Zionist target, whether civilian or military, in any country of the world, should begin by targeting them.”

iii. On or about March 7, 2026, AL-SAAD I posted the following message on the AL-SAAD I Snapchat Account, titled “Shadow soldiers,” which read: “To all jihadens people in weast ,east [sic] earth...Its permission to all silent cells (R362 – C357 – A351) For work.” Based on my training and experience, I believe that this message was intended to activate terrorist cells around the world to engage in attacks in support of the IRGC and its proxies, in response to the Iranian Military Conflict:



e. As discussed in greater detail below, since the Iranian Military Conflict began on or about February 28, 2026, AL-SAAD I, as a high level member of Kata'ib Hizballah and an associate of the IRGC, has been involved not only in calling on others to carry out terrorist attacks but also in the planning, execution, and promotion of numerous attacks that have occurred in Europe against U.S. and Israeli interests.

The European Terrorist Attacks

15. Based on my participation in this investigation, my conversations with law enforcement officers and others, my review of video recordings, documents, and publicly available information, and my training and experience, I have learned, among other things, the following:

a. On or about March 9, 2026—the day of the first of the European Terrorist Attacks— MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, posted on the AL-SAADI Telegram Account the following message with Harakat Ashab al-Yamin al-Islamiya’s logo, calling on “warriors of Islam” to engage in “jihad,” or violent holy war:



The message, translated, reads: “Islamic Movement of the Companions of the Right.^[4] In the name of God, the Most Gracious, the Most Merciful (Go forth, light and heavy, and strive with your wealth and your lives in the cause of God) God Almighty has spoken the truth O warriors of Islam, O knights of the shadows, defend your religion, rise, God willing, for jihad in His cause, set out where the darkness shelters, and let the light of truth be revealed by your strength, and spread justice and light throughout the world. (Badr 1 - Badr 2 - Fath 6 - Khaybar 14) Trust in God.”

b. Since on or about March 9, 2026, there have been approximately 18 reported terrorist attacks in Europe against U.S. and Israeli interests, including the stabbing of a Jewish American citizen. AL-SAADI has been involved in the planning, execution, and promotion of these attacks, which appear to have been carried out both in retaliation for the United States and Israel’s recent military actions against Iran and to compel the United States and Israel to halt those actions. Specifically:

i. On or about March 9, 2026, there was an attack using explosives against a synagogue in Liège, Belgium. On or about March 11, 2026, AL-SAADI posted a propaganda video on the AL-SAADI Telegram Account of masked men detonating an explosive device in front of the synagogue. In this video, Harakat Ashab al-Yamin al-Islamiya

⁴ Islamic Movement of the Companions of the Right is the English name for Harakat Ashab al-Yamin al-Islamiya.

claimed credit for the attack by imposing its logo over a video recording of the attack; below is a screenshot from the video with Harakat Ashab al-Yamin al-Islamiya's logo on the upper right hand side (circled in red):



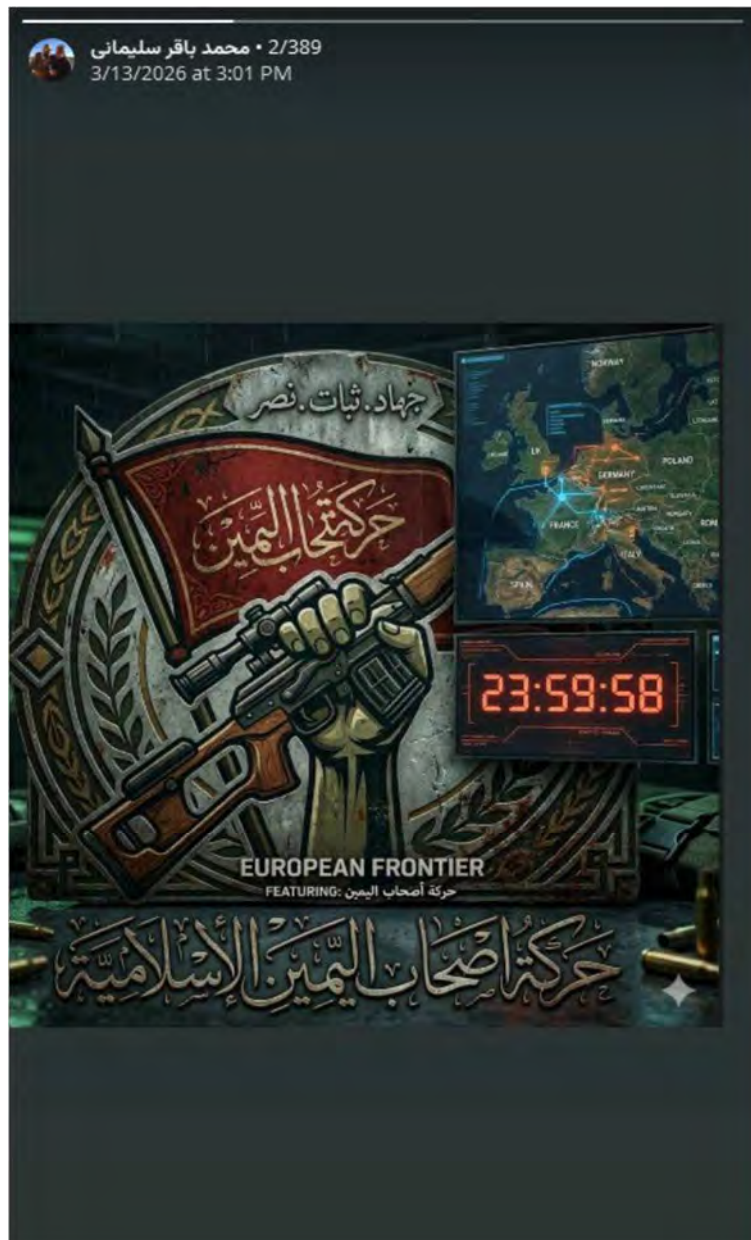
Based on my training and experience, I know that it is common for terrorist groups to make propaganda videos promoting its attacks to, among other things, recruit others to participate in future similar conduct.

ii. On or about March 13, 2026, there was an arson attack on a synagogue in Rotterdam, Netherlands. That same day, AL-SAAD I posted a propaganda video on the AL-SAAD I Telegram Account of a fire at the synagogue, in which Harakat Ashab al-Yamin al-Islamiya claimed credit for the attack.⁵

iii. Also on or about March 13, 2026, AL-SAAD I posted on the AL-SAAD I Telegram Account the following image, containing the logo of Harakat Ashab al-Yamin al-Islamiya with the words “European Frontier[:] featuring [Movement of the Companions

⁵ Based on my involvement in the investigation, I do not believe that the videos of the attacks posted by AL-SAAD I and Harakat Ashab al-Yamin al-Islamiya referenced in this Complaint were otherwise available to the public at the time of their posting.

of the Right],” written directly below, along with a map of Europe and a clock appearing to depict a count-down of 24 hours below the map.



iv. On or about March 14, 2026, there was an attack involving explosives against a Jewish school in Amsterdam, Netherlands. That same day, AL-SAADI posted on the AL-SAADI Snapchat Account a propaganda video of an explosion outside of the school and the assailants of the attack escaping on a motorcycle. A screenshot of the video is shown below. The logo of Harakat Ashab al-Yamin al-Islamiya appears in the upper left corner of the image (circled in red).



v. On or about March 15, 2026, there was an attack involving explosives against the Bank of New York Mellon, an American bank, in Amsterdam, Netherlands. The next day, on or about March 16, 2026, AL-SAADY posted on the AL-SAADY Snapchat Account a propaganda video of the attack, in which Harakat Ashab al-Yamin al-Islamiya claimed responsibility for the attack. The video also showed aspects of the attack planning, including maps of the location of where the attack would be and included the following message, which read: “In the name of Allah, the Most Gracious, the Most Merciful This is the Final Warning[.] To all the peoples of the world, especially in the European Union, Immediately distance yourselves [] from all American and Zionist interests, facilities, and what is affiliated with them.”



vi. On or about March 23, 2026, at approximately 1:45 a.m., three masked individuals carried out an arson attack on four Hatzalah Ambulances in London, United Kingdom.⁶ That same day, Harakat Ashab al-Yamin al-Islamiya posted on Telegram a propaganda video in which it claimed responsibility for the attack.⁷ On or about March 25, 2026, AL-SAADI posted on social media propaganda videos of the attack.

vii. On or about March 23, 2026, at approximately 11:30 p.m., two masked individuals carried out an arson attack on a car located on a central street in a Jewish neighborhood in Antwerp, Belgium. On or about March 24, 2026, AL-SAADI posted a propaganda video of the attack on the AL-SAADI Snapchat Account, in which Harakat Ashab al-Yamin al-Islamiya claimed responsibility for the attack.

viii. On or about March 28, 2026, two individuals attempted to place an improvised explosive device at the Bank of America building in Paris, France. On or about March 20, 2026, Harakat Ashab al-Yamin al-Islamiya published a propaganda video in which it previewed that it was going to attack that very site.

ix. On or about April 3, 2026, there was an attempted explosives attack against a pro-Israel organization in Nijerk, Netherlands. On or about April 4, 2026, a propaganda video was posted by Harakat Ashab al-Yamin al-Islamiya on Telegram showing law enforcement at the site of the attack and a message justifying the location chosen, including a warning to “distance yourselves from Zionist and American interests.” A screenshot of the video is shown below, with Harakat Ashab al-Yamin al-Islamiya’s logo in the upper right hand corner (circled in red):

⁶ Based on my review of publicly available information, I know that that Hatzalah is Hebrew for “rescue” and that Hatzalah is the world’s largest volunteer ambulance service, which provides 24/7 free and rapid pre-hospital emergency care, and serves primarily Orthodox Jewish communities.

⁷ Based on my review of publicly available information, I have learned, among other things, that Harakat Ashab al-Yamin al-Islamiya initially posted using a Telegram account in its name. That account, however, was closed. Since then, Harakat Ashab al-Yamin al-Islamiya has posted propaganda videos of its terrorist attacks on several different Telegram accounts that are affiliated with and post content in support of the Shi’ite militant community and the Axis of Resistance.



x. On or about April 10, 2026, at approximately 12:45 a.m., pyrotechnic devices were thrown into the dining area of an Israeli restaurant in Munich, Germany. On or about April 16, 2026, AL-SAADI posted a propaganda video on the AL-SAADI Snapchat Account in which Harakat Ashab al-Yamin al-Islamiya claimed credit for the attack. The video showed damage from the attack with a warning that “[the attack] could have happened during the day,” and featured Harakat Ashab al-Yamin al-Islamiya’s logo, circled in red in the screenshot below:



xi. On or about April 12, 2026, there was an arson attack against a synagogue in Skopje, North Macedonia. On or about April 16, 2026, AL-SAADI posted a propaganda video on the AL-SAADI Snapchat Account showing the site of the attack with a red target symbol and surveillance footage of the synagogue on fire, as depicted in the screenshots

below. The logo of Harakat Ashab al-Yamin al-Islamiya appears in the upper right corner of the images (circled in red):



xii. On or about April 15, 2026, there were two attacks in London, United Kingdom. Specifically, there was an arson attack against a synagogue in London, and an arson attack against a media organization in London. That same day, AL-SAADY posted on the AL-SAADY Snapchat Account propaganda videos of each attack, in which Harakat Ashab al-Yamin al-Islamiya claimed credit, and explained that the media organization was targeted because of its “financial ties with Israel and Saudi Arabia.” Below is a screenshot from the video of the second attack, which shows an individual who appears to be carrying out the attack, and the logo of Harakat Ashab al-Yamin al-Islamiya:



xiii. On or about April 16, 2026, Harakat Ashab al-Yamin al-Islamiya posted a video on Telegram in which it claimed that its members had attacked the Israeli Embassy using two drones that were loaded with dangerous carcinogenic and radioactive materials. That same day, AL-SAADY posted on the AL-SAADY Snapchat Account an image of a drone with Harakat Ashab al-Yamin al-Islamiya's logo on it, shown below:⁸



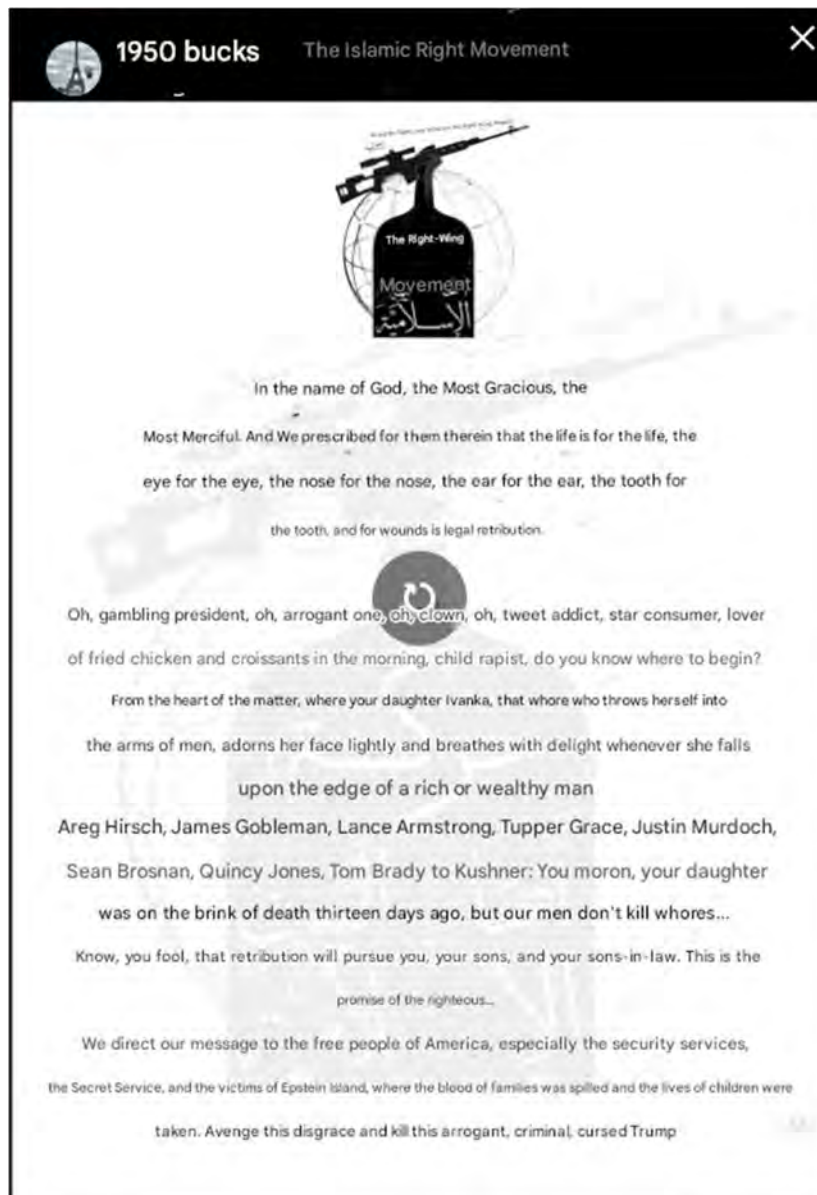
⁸ On or about April 17, 2026, law enforcement recovered suspicious items in Kensington Gardens approximately 500 meters from the Israeli Embassy in London, United Kingdom. The items included the remnants of a drone and two jars containing a powder substance, which was subsequently determined to be non-hazardous.

xiv. On or about April 17, 2026, there was an arson attack against a Jewish charity organization in London, United Kingdom. In the attack, an unknown individual lit a plastic bag containing bottles of accelerant in the front doorway of the building, causing damage. On or about April 18, 2026, Harakat Ashab al-Yamin al-Islamiya posted a propaganda video of the attack on Telegram, accompanied by a message that the victim organization had been targeted due to its founder's prior affiliation with the Israeli army.

xv. On or about April 18, 2026, there was an arson attack against a synagogue in London, United Kingdom. Specifically, two individuals threw a bottle containing a flammable liquid through the window of the synagogue. On or about April 19, 2026, Harakat Ashab al-Yamin al-Islamiya posted a propaganda video of the attack on Telegram, accompanied by a message that the synagogue had been targeted because it is "one of the centers of Zionist influence in the British capital." Below is a screenshot from that video, showing what appears to be a video call with the perpetrators of the attack, accompanied by numerous images of Harakat Ashab al-Yamin al-Islamiya's logo:



xvi. On or about April 20, 2026, AL-SAADI posted on the AL-SAADI Snapchat Account a message with the logo of Harakat Ashab al-Yamin al-Islamiya, threatening President Trump and members of his family, and specifically imploring others to "kill this arrogant, criminal, cursed Trump." An English translation of the post is shown below:



xvii. On or about April 23, 2026, Harakat Ashab al-Yamin al-Islamiya issued the following message with a 72-hour countdown, warning that “time is running out”:



xviii. On or about April 29, 2026, an individual stabbed and seriously injured two Jewish men—including a dual U.S.-British citizen—in London, United Kingdom. That day, Harakat Ashab al-Yamin al-Islamiya posted a propaganda video on Telegram in which it claimed credit for that attack.

AL-SAADİ’s Recorded Statements About the European Terrorist Attacks

16. Based on my participation in this investigation, my conversations with law enforcement officers and others, including with a source of information for the FBI (“SOI-1”), and my review of law enforcement reports, I have learned, among other things, the following⁹:

a. On or about March 20 and April 1, 2026, MOHAMMAD BAQER SAAD DAWOOD AL-SAADİ, the defendant, using a certain phone number (the “AL-SAADİ Phone Number”), spoke to SOI-1, who recorded the calls (the “March 20 Recorded Call” and the “April 1 Recorded Call”).¹⁰ Based on my review of the recorded calls, which took place in Arabic,

⁹ Since at least in or about 2026, SOI-1 has voluntarily provided information to the FBI about MOHAMMAD BAQER SAAD DAWOOD AL-SAADİ, the defendant. Information provided by SOI-1 has been corroborated by, among other things, phone records and records from AL-SAADİ’s social media accounts.

¹⁰ Based on my review of phone records for the AL-SAADİ Phone Number and records for AL-SAADİ’s social media accounts as well as publicly available information, and conversations with SOI-1, I have learned among other things that AL-SAADİ is the user of the AL-SAADİ Phone

as well as transcripts containing draft translations of the calls, I have learned that on those calls, AL-SAADi, among other things: discussed the European Terrorist Attacks, stated that he wanted the SOI-1's help in planning additional terrorist attacks in the United States, and further stated that he (AL-SAADi) was willing to kill people in any such future attacks.

b. Specifically, on the March 20 Recorded Call, AL-SAADi referenced "Ashab al-Yamin"—which I believe to be an abbreviated name for Harakat Ashab al-Yamin al-Islamiya, that is, the group that has claimed credit for the European Terrorist Attacks—and then referenced the European Terrorist Attacks in Belgium, Amsterdam, and Rotterdam; confirmed that "our people" were also behind two attacks in Canada against "the consulate and the Knesset," the first of which I believe refers to a March 10, 2026 shooting at the U.S. consulate in Toronto, Canada, and the second of which I believe refers to an attack on a synagogue (the "Canadian Terrorist Attacks"); stated that he is "running multiple teams," which I believe is consistent with the fact that different individuals based in Europe have carried out each of the European Terrorist Attacks; and asked SOI-1 if SOI-1 could help AL-SAADi carry out additional attacks in the United States and in Canada. AL-SAADi stated that he would give SOI-1 the "targets," such as "Jewish synagogues[,] . . . Zionist headquarters," and that AL-SAADi "do[es] not have a problem with killing, neither do I have a problem with terrifying [the targets]." AL-SAADi explained that he did not need help carrying out attacks in Europe because "things are working for us here in Europe," "we really don't need anything," but "in Canada or America, if [SOI-1] can do anything . . . that would be . . . very, very important."

c. On the April 1 Recorded Call, AL-SAADi asked if SOI-1 knew someone who could carry out attacks in the United States and, if so, how much money that individual would want to be paid. SOI-1 claimed that he "was able to find a Mexican person who is willing to carry out a bombing operation." AL-SAADi asked, "[h]ow much do they ask in exchange for the bombing, and how much for the fire?" AL-SAADi also said, "[a]s for fire, we'd like [to target] about three places, and we will give them money. We would also like bombing," and "[w]e can provide them the place to target." SOI-1 then asked, "[w]hat is it that you'd like to bomb?," to which AL-SAADi responded, "I mean, we provide him with a Jewish temple, a Jewish center."

d. On the April 1 Recorded Call, AL-SAADi asked for more details about how SOI-1's purported contact would carry out the attacks, asking, "[h]ow will he carry out the bombing? . . . What will he use? A car bomb, throw an IED [an improvised explosive device] or what?" When SOI-1 stated that the contact would likely "throw a hand grenade," AL-SAADi insisted that he "want[ed] something more powerful." AL-SAADi inquired if the person(s) carrying out the attack would kill, and SOI-1 responded, "They do everything . . . [e]verything has a certain cost." AL-SAADi responded, "Okay. How do we . . . Do you think we should start by having them do a fire?" AL-SAADi further specified when he wanted the attack to happen and how much he was willing to pay, stating: "I want it tomorrow or the day after. Yes, I want it tomorrow or the day after. I want to hit them soon."

Number. Among other things, the AL-SAADi Phone Number is registered to a WhatsApp account with a profile picture of AL-SAADi with Soleimani. In addition, the AL-SAADi Phone Number is registered to the AL-SAADi Snapchat Account, the AL-SAADi Telegram Account, and the AL-SAADi X Account.

e. On the April 1 Recorded Call, AL-SAADI also explained how he would pay whoever carried out the terrorist attack in the United States. Specifically, AL-SAADI stated, “[w]e normally have a third par- we always- in Europe, we have our guys; even in America, for example the other day, and in Canada we have our guys. But if you send the Mafia, they can pick a place of their choosing, at any money exchange. If they hit, then that’s good, but if they don’t, then I get my money back. This is how the deal is.” Based on my training and experience and my involvement in this investigation, I believe that in discussing the potential payment for a terrorist attack in the United States, AL-SAADI was describing his and Kata’ib Hizballah’s experience in paying individuals for terrorist attacks, including in connection with the European and Canadian Terrorist Attacks. In regard to payment, AL-SAADI said, “[w]herever you’d like, I can give you the ten thousand. Just tell me where you’d like them to be transferred and I’ll do it.” SOI-1 told AL-SAADI that he would be back in touch with the contact for the person that was willing to carry out the terrorist attack in the United States in exchange for money.

f. On the April 1 Recorded Call, AL-SAADI also discussed that “we sent one . . . [h]e was placing the IED and as he was activating it, they caught him . . . *Bank of Ameri-* that’s the best confrontation.” Based on my involvement in this investigation, I understand this to be an admission by AL-SAADI that he was responsible for the March 28 attack on the Bank of America building in Paris, France, one of the European Terrorist Attacks. *See supra* ¶ 15(b)(viii).

g. Finally, on the April 1 Recorded Call, in connection with planning terrorist attacks in the United States, AL-SAADI said, “[t]his war will not end. Either they eradicate us, or we eradicate them.”

AL-SAADI Attempted to Commit Terrorist Attacks in the United States

17. Based on my participation in this investigation, including my review of recorded communications between MOHAMMAD BAQER SAAD DAWOOD AL-SAADI, the defendant, and an undercover law enforcement officer (“UC-1”), I have learned, among other things, the following:

a. On or about April 3, 2026, SOI-1 introduced UC-1 over the phone to AL-SAADI and represented to AL-SAADI that UC-1 was a Mexican cartel member who had the capability of carrying out a terrorist attack in New York and elsewhere in the United States.

b. That same day, AL-SAADI texted UC-1 a photograph and a map showing the exact location of a prominent Jewish synagogue located in New York, New York (the “New York Synagogue”). AL-SAADI directed UC-1 to carry out a terrorist attack against the New York Synagogue. In doing so, AL-SAADI texted UC-1 specific information about the New York Synagogue, including a document in Arabic that described the New York Synagogue’s congregation as one supporting “the right for Israel to exist.”

c. In addition, on or about April 3, 2026, AL-SAADI sent UC-1 photographs and maps showing the exact locations of two additional potential U.S.-based Jewish institutions to attack, namely, two prominent Jewish centers in Los Angeles, California, and Scottsdale, Arizona, respectively (collectively, the “Jewish Centers”). AL-SAADI also sent UC-

1 documents in Arabic describing the Jewish Centers as “staunch supporters of Zionism outside Israel” and a “beacon for solidarity and support to Israel and its Zionist objectives.”

d. Later on or about April 3, 2026, UC-1 sent AL-SAADI a QR code¹¹ to scan so that AL-SAADI could send UC-1 an initial payment for UC-1’s services in carrying out the terrorist attack in New York, New York. On or about April 4, 2026, AL-SAADI, through SOI-1, relayed to UC-1 that he needed additional cryptocurrency wallet details in order for UC-1 to receive the initial payment from AL-SAADI.

e. On or about April 3, 2026, on a recorded phone call, AL-SAADI asked UC-1 whether UC-1 would use an improvised explosive device or “set the place on fire”, which based on the context of this conversation and other conversations between AL-SAADI, UC-1, and/or SOI-1, I understand to be referring to the method that UC-1 would use to carry out terrorist attacks against the New York Synagogue and/or the Jewish Centers. AL-SAADI added that he had “no problem starting with fire” but that what was “most important[.]” was that “the incident... be recorded.”

f. On that same call, AL-SAADI discussed how much money AL-SAADI would pay UC-1 for carrying out these terrorist attacks in the United States. Specifically, UC-1 and AL-SAADI agreed to a price of \$10,000 U.S. dollars for these attacks. AL-SAADI stated that he would make an initial payment of \$3,000 U.S. dollars, in cryptocurrency, to UC-1, and that “if everything [went] well,” AL-SAADI would then pay the remaining amount, for a total of \$10,000 U.S. dollars. AL-SAADI subsequently asked whether UC-1 could “set the three locations on fire at the same time,” in which case AL-SAADI would send UC-1 the full amount of \$10,000 U.S. dollars in a single transaction. AL-SAADI further stated he would prefer that UC-1 formed three separate teams—that is, one team for each target location—but that AL-SAADI also did not want UC-1 to rush the planning of the attacks.

g. On or about April 4, 2026, at approximately 12:56 p.m., AL-SAADI paid UC-1 approximately \$3,000 U.S. dollars in cryptocurrency, in anticipation of UC-1 conducting an attack on the New York Synagogue.¹²

h. On or about April 4, 2026, at approximately 10:20 p.m., AL-SAADI asked UC-1, over text message. “Will the operation be today or tomorrow,” to which UC-1 responded, “tomorrow.”

i. On or about April 6, 2026, at approximately 4:23 p.m., AL-SAADI, through SOI-1, relayed to UC-1 that “the operation needs to happen TODAY[.] It’s important that it’s done tonight.” AL-SAADI, through SOI-1, explained “[w]e have more important work to do but this needs to be done first.” At approximately 4:24 p.m., AL-SAADI, through SOI-1, texted UC-1, “[C]all me with the details as soon as you can . . . I wanna see good news tonight . . . not tomorrow bro,” referring to the fact that AL-SAADI wanted the terrorist attack against the New York Synagogue to be complete by “tonight.”

¹¹ A QR code is a machine-readable barcode consisting of black and white squares, designed to be scanned by smartphones and other devices.

¹² The time stamps in this section are in Pacific Daylight Time.

j. On or about April 6, 2026, at approximately 9:30 p.m., UC-1 sent AL-SAAD I a video showing that there was a police presence on the block of the New York Synagogue. At approximately 10:38 p.m., AL-SAAD I asked for an update on the status of the attack, but did not receive a response.

k. On or about April 7, 2026, at approximately 5:17 a.m., AL-SAAD I again asked UC-1 what had happened and why UC-1 had not completed the operation.

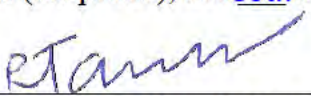
WHEREFORE, I respectfully request that a warrant be issued for the arrest of MOHAMMAD BAQER SAAD DAWOOD AL-SAAD I, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

FURTHER, the Government respectfully moves for the Complaint and arrest warrant to remain sealed—with the exception that the Complaint and arrest warrant are unsealed for the limited purpose of disclosing the existence of or disseminating the Complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant's arrest, extradition, or expulsion, or as otherwise required for purposes of national security.

/s/ Kathryn McDonald, by the Court with permission

Kathryn McDonald
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of this Complaint by reliable electronic means (telephone), this 30th day of April, 2026.


THE HONORABLE ROBYN F. TARNOFSKY
United States Magistrate Judge
Southern District of New York