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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
ATHENS DIVISION

UNITED STATES OF AMERICA	
v.	Case No. 3:25-mj-00027
YOUNES MOUSTAFA YOUNES	**FILED UNDER SEAL**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kate Palmquist, Special Agent, Federal Bureau of Investigation ("FBI"), Atlanta, Georgia, hereby depose and state the following under penalty of perjury:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the FBI and have been since 2020. I am currently assigned to the Atlanta Joint Terrorism Task Force in Atlanta, Georgia. During the course of my career with the FBI, I have participated in multiple investigations of unlawful activity, including crimes of terrorism and national security-related matters. In the course of these investigations, I have conducted or participated in surveillance, the introduction and debriefings of informants, and the execution of search and arrest warrants, among other duties. Through my training, education, and experience, I have become familiar with various terrorist organizations, as well as the manner in which terrorists are recruited, receive training and operate, and some of the methods that are used to conceal evidence of participation in such illegal activity. I have become familiar with some of the tradecraft which terrorist groups employ to disguise their identities and the location and nature of their activities.

2. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents and witnesses, and a review of the case file. This affidavit is intended to show merely that there is sufficient probable cause for the requested

warrant and does not set forth all of my knowledge about this matter. Unless otherwise specified, where statements of others are set forth in this affidavit, they are set forth in substance and in part. Furthermore, the events described in this affidavit occurred on or about the dates provided herein.

II. PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of an application for a complaint and arrest warrant for Younes Mustafa Younes ("YOUNES").

4. Based on my training and experience, and the facts set forth in this affidavit, there is probable cause to believe that YOUNES violated Title 18, United States Code, Sections 1512(c) and 1956(a)(2) (Destruction of Evidence and Money Laundering. As detailed below, YOUNES is a supporter of the Islamic State of Iraq and Syria ("ISIS" or "the Islamic State"), a designated Foreign Terrorist Organization ("FTO").[1] There is probable cause to believe that YOUNES has made financial contributions to promote ISIS's cause, as outlined below.

III. THE CHARGES

5. Within the Middle District of Georgia, the defendant, Younes Moustafa Younes, a national of the United States, did:

[1] On or about October 15, 2004, the United States Secretary of State ("Secretary") designated al-Qaeda in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act ("INA") and as a Specially Designated Global Terrorist Organization ("SDGT") under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary amended the designation of AQI as an FTO under Section 219 of the INA and as a SDGT under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (*i.e.*, "ISIS" — which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO and SDGT.

a) On or about June 10, 2026, did transmit, transfer and attempt to transmit and transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, to wit: as defined in 18 U.S.C. § 2339B, in violation of Title 18, United States Code, Section 1956(a)(2).

b) Beginning on a date as yet unknown and concluding on November 18, 2026, did corruptly alter, destroy and mutilate records, documents and objects with the intent to impair their integrity or availability for use in an official proceeding and did corruptly otherwise obstruct and impeded and official proceeding and did attempt to do so, in violation of Title 18, United States Code Section 1512(c).

IV. STATEMENT OF PROBABLE CAUSE

Initial Investigation

6. In or around mid-2020, the FBI obtained information that YOUNES had accessed and viewed ISIS propaganda online. On or about September 28, 2020, law enforcement interviewed YOUNES, who acknowledged that he had viewed the ISIS-related materials, but claimed that he had no interest in radical Islam and had visited the sites to educate himself about current events. Notably, YOUNES stated, in sum and substance, that he knew the federal government would eventually come knocking on his door for visiting these types of websites. YOUNES also stated, in sum and substance, that no one from the sites he had visited had asked YOUNES to send them money, and that YOUNES would not "entertain any of that nonsense" in any event. YOUNES claimed that he was looking to get married, have children, and live a peaceful life.

7. Information subsequently obtained by the FBI, however, shows that YOUNES accessing this ISIS-related material and extremist propaganda was not an isolated incident. Rather YOUNES, a natural-born U.S. citizen whose deceased father was of Egyptian descent, has become radicalized over time, espousing extremist ideology.

8. For example, the FBI has learned that YOUNES repeatedly sent money from the United States to one or more individuals and/or entities who are believed to be raising money in support of the wives and families of ISIS fighters. Records obtained from a cryptocurrency provider during the course of the investigation show that between in or about December 2021 and April 2022, while YOUNES still resided in New Jersey, YOUNES sent approximately $9,206, in approximately 11 separate transactions, to one or more cryptocurrency addresses associated with the fundraising campaign "The Forgotten Ones" on or about the below approximate dates:

Date:	Amount
12/14/2021	$866
12/16/2021	$900
12/19/2021	$900
12/22/2021	$900
12/26/2021	$900
1/10/2022	$900
1/12/2022	$900
1/21/2022	$900
2/4/2022	$240
3/10/2022	$900
4/22/2022	$900

9. The Forgotten Ones raises funds for wives and families of ISIS fighters held in refugee camps in northeastern Syria, which had included the al-Hol (a/k/a "al Hawl") Camp, previously located on the southern outskirts of the town of al-Hawl in northern Syria, close to the Syria-Iraq border ("the al-Hol Camp" or "the Camp").

10. The Camp housed individuals displaced from the areas previously controlled by ISIS and was controlled by the U.S.-backed Syrian Democratic Forces ("SDF"). ISIS, however, had used the Camp to raise money for ISIS members and their families.[2] As of February 2026, the Syrian government closed the al-Hol Camp.[3]

11. Based on my training and experience and my knowledge of the investigation, I know that financial donations to the individuals in the al-Hol Camp are sometimes ostensibly made as humanitarian contributions and typically avoid any overt mention of ISIS to maintain plausible deniability. Therefore, the donations in question may ultimately benefit ISIS as an organization—as opposed to individual ISIS members and their families—because they could provide direct or indirect financial support to ISIS, its fighters, and their family members.

12. Notably, fundraising campaigns such as The Forgotten Ones are not easily accessible via a normal internet search. Instead, finding the cryptocurrency address(es) associated with The Forgotten Ones requires receiving a link, often on encrypted platforms such as Telegram

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[2] United States Department of the Treasury: 2022 National Terrorist Financing Risk Assessment, February 2022, at 24 ("Additionally, ISIS members and their families residing in Syria's al-Hawl Refugee Camp have used charitable appeals to receive funds from foreign supporters.") (available at https://home.treasury.gov/system/files/136/2022-National-Terrorist-Financing-Risk-Assessment.pdf); *see also* TRM Labs, *Fundraising Campaigns for ISIS Families: Analyzing the Use of Cryptocurrency*, April 11, 2022 ("Thousands of individuals were captured after the fall of ISIS; the men were taken to prisons and the women and children were taken to internment camps such as Roj and al-Hol (aka al-Hawl), which remain a dangerous breeding ground for the group's ideology.") (available at https://www.trmlabs.com/resources/blog/fundraising-campaigns-for-isis-families-analyzing-the-use-of-cryptocurrency); Devorah Margolin, The Washington Institute, *The Problem with al-Hol: The Future for ISIS-Affiliated Families*, July 18, 2023, at 2 ("ISIS has made it explicitly clear that they see these populations [in the camps such as al-Hol] as the future to their success.") (https://www.washingtoninstitute.org/sites/default/files/pdf/ProblemWithAlHol-video-transcript-July2023.pdf).

[3] Human Rights Watch, *Northeast Syria: Camp Closures Leave Thousands Stranded, Many Countries Refuse to Repatriate Their Citizens*, February 23, 2026 (https://www.hrw.org/news/2026/02/23/northeast-syria-camp-closures-leave-thousands-stranded).

Messenger ("Telegram"),[4] or specifically searching within those platforms for unique terms such as "Baghouz"[5] or "Baghuz" or "sisters," the latter being a reference to female ISIS supporters and/or the wives of ISIS fighters. In short, those in search of ordinary Muslim charities are unlikely to stumble upon The Forgotten Ones by happenstance.

13. In my training and experience, the fact that ISIS at times used ostensibly charitable donations to the al-Hol camp residents as part of its own fundraising efforts is well documented. For example, the U.S. Department of Treasury's 2022 National Terrorist Financing Risk Assessment Report states, in relevant part:[6]

> [ISIS] leverages their support network within the refugee camps, such as al-Hawl [or al-Hol] in Northern Syria and others, to receive donations from supporters in the international community. External donations to refugee camps come into the region through various means—such as money remitters and virtual asset service providers (VASPs)—and then exit the regulated financial system as cash via hawaladars [informal money brokers], where they are subsequently sent to the camp. To solicit donations, ISIS supporters in these camps often use various social media platforms and disguise their appeal as humanitarian aid. . . . Virtual assets are being sent directly to ISIS supporters located in northern Syria, often to Idlib, or indirectly via Turkey, where ISIS is able to access them at virtual asset trading platforms.

14. The investigation has revealed that YOUNES was aware of the link between ISIS and the camps, and he even took steps to conceal his financial support of the Camp's occupants. Specifically, YOUNES used the alias "Dominic Moras" to send all of the above-mentioned

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[4] Telegram is an end-to-end encrypted messaging and telephone application.

[5] A reference to airstrikes on ISIS by the SDF, assisted by U.S.-led coalition forces, on March 18, 2019, in Baghouz, Syria, as part of efforts by SDF and the U.S. to defeat ISIS in Syria.

[6] United States Department of the Treasury: 2022 National Terrorist Financing Risk Assessment, February 2022, at 5 (available at https://home.treasury.gov/system/files/136/2022-National-Terrorist-Financing-Risk-Assessment.pdf, last visited August 26, 2025).

cryptocurrency transactions to The Forgotten Ones. In my training and experience, using a false identity to make nearly a dozen cryptocurrency payments, which appear to have been spaced out evenly and all but two of which are in the amount of exactly $900, is not consistent with legitimate charitable contributions, but is consistent with the donor being aware that his actions are unlawful.

15. Furthermore, below are photographs captured by the cryptocurrency ATM during the last three transactions:[7]

2/4/2022:



3/10/2022:



[7] The cryptocurrency ATMs YOUNES used for the previous transactions did not capture a photograph of him during the course of the transaction. However, the same phone number— (609) 648-6622 — was used for all the transactions. The vehicle he was driving at the time also links him to these transactions.

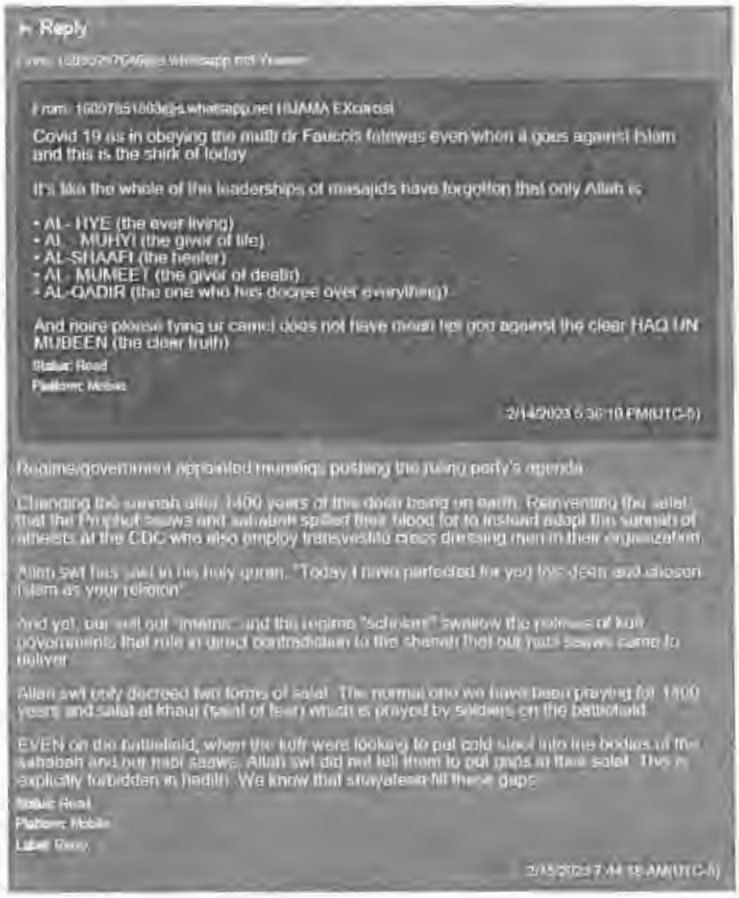
4/22/2022:



16. The fact that YOUNES is wearing a facemask in these photos is a notable act of concelam because YOUNES has expressed skepticism that the risks from the COVID-19 global pandemic were real. For example, in a message posted on or about February 15, 2023, in a group chat,[8] wherein the participants complained about the closure of their mosque amid COVID-19 restrictions, YOUNES stated:[9]

[8] *See* paragraph 20 and fn. 9 below.

[9] *Sunnah* is Arabic for "tradition" and refers to the body of traditions and practices of the Islamic prophet Muhammad followed by Sunni Muslims. *Deen* is Arabic for "religion," and *salaat* refers to the Islamic daily prayers. The acronym "SAW" (written as "saaws" here) stands for the phrase *salallahu alayhi* wasalam, meaning "peace and blessing be upon him," is an honorific phrase that Muslims utter following the mention of Prophet Muhammad. "SWT" is an abbreviation of the Arabic phrase "*Subhanahu Wa Ta'ala*," which means "Glorified and Exalted is He" and often follows the mention of the term "*Allah*," meaning God. The *Sahaba* (or *aṣ-ṣaḥāba*), literally "the companions," were the Muslim disciples and followers of the Islamic prophet Muhammad who saw or met him during his lifetime. *Kufr* is Arabic for "disbelief" and Islamic extremists refer to non-believers as *kafir* (singular) or *kuffar* (plural). *Shayateen* (or *shayatin*, plural of *shaytaan*) refers to a class of evil spirits in Islam that incite humans to sin. *Nabi* is Arabic for prophet.



17. The foregoing messages were sent using a WhatsApp account associated with YOUNES' cell phone. Based on my training and experience, and YOUNES's stated views concerning the COVID-19 pandemic, it appears that by wearing the mask, YOUNES was attempting to obscure his identity while sending these transactions.

18. In addition, communications between YOUNES and an associate known to the affiant (ASSOCIATE ONE) show that YOUNES believed that making financial contributions to

the camps was one way to fulfill his duty to support ISIS, its fighters, and their families, and that YOUNES encouraged ASSOCIATE ONE to do the same.

19. For example, on or about June 19, 2023, YOUNES sent ASSOCIATE 1 a message[10] stating in sum and substance "I would highly recommend taking a look at them" and "He helps our brothers and sisters in different places in the world."

20. In my training and experience, ISIS supporters refer to ISIS fighters and fellow ISIS supporters as "brothers and sisters" when speaking amongst themselves. My belief is reinforced by the conversation below in which YOUNES referred to the camps in Syria and helping the wives and children of "our brothers who fought *fi si bi allah* [sic][,]" a reference to ISIS fighters. "*Fi sabillilah*" is an Arabic expression meaning "in the cause of God" or "for the sake of God." Based on my training and experience, ISIS and its supporters use the Arabic expression "*jihad fi sabillilah*" to refer to violent attacks and/or paramilitary actions against persons and/or governments they consider to be apostates or infidels:



[10] On or about July 5, 2024, ASSOCIATE 1 arrived at John F. Kennedy International Airport from United Arab Emirates and was interviewed by the U.S. Customs and Border Protection. Except where specified otherwise, the communications between YOUNES and ASSOCIATE ONE referenced in this affidavit, as well as the group chat discussed in paragraph 21-22, were transmitted using the end-to-end encrypted messaging application WhatsApp, and were discovered during a border search of ASSOCIATE 1's cellular telephone conducted pursuant to the CBP's border search authority. Based on my training and experience, WhatsApp is a multiplatform messaging service that enables users to chat directly or in groups using text, voice, and video.





21. YOUNES also sent ASSOCIATE 1 a video promoting Dar'ul Hayr's activities.



22. As illustrated by the following screenshots, the video depicts several women and young females at the al-Hol camp in Syria:



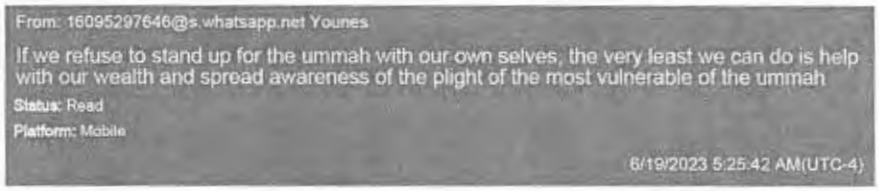
23. In the opening segment of the video, the young females are holding up their index fingers. In my training and experience, a pointing index finger raised upwards is used in Islam as an affirming gesture of the oneness of God, also referred to as *Tawhid*. However, it has been coopted by extremist groups such as ISIS that commonly use the gesture as a demonstration of solidarity and support for ISIS and its ideology. As a result, this gesture is almost universally associated with ISIS when accompanied by other ISIS insignia and/or propaganda.

24. The video also shows one of the adult females handing the female students stacks of cash in what appears to be Syrian currency. The video concludes with a message of gratitude for the sender of the cash, which was ostensibly donated on behalf of a baby named "Sare" from Germany:





25. YOUNES then added the following message:



26. Based on my training and experience, I know that ISIS supporters commonly refer to themselves as the "*ummah*"[11] as they consider themselves to be the only true Muslims. Based on my training and experience, it appears that YOUNES is encouraging ASSOCIATE 1 to donate to the al-Hol camp to aid the cause of ISIS in lieu of becoming an ISIS fighter himself.

27. YOUNES then shared another video, showing several children in what appears to be a location in Afghanistan, holding a banner bearing the name and logo of Dar'ul Hayr.

28. The video contained many female children who are wearing the black head and face covering typically worn by conservative Muslim females and holding up their index finger which, as noted above, is commonly considered a sign of solidarity with ISIS:[12]

29. On or about June 23, 2023, YOUNES sent another video to ASSOCIATE 1. The video contains the narration of a religious account from the early days of Islam wherein one of the individuals who is killed during a battle against European forces is said to have been granted paradise due to his role as a *mujahid* and he promises the same to the individual who is providing service to the fighters.

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[11] *Ummah* is an Arabic term variably translated as Muslim identity, nation, religious community, or the concept of a Commonwealth of the Muslim Believers. It is a synonym for *ummat al-Islām* (the Islamic nation) and is commonly used to mean the collective community of Muslim people and transcends any national boundary.

[12] YOUNES also sent ASSOCIATE 1 a video that appeared to show a drinking water well somewhere in Africa surrounded by children holding a Dar'ul Hayr banner.

30. In his messages to ASSOCIATE 1, YOUNES continuously encouraged ASSOCIATE 1 to practice an extremist version of Islam and sent ASSOCIATE 1 Islamist extremist propaganda.

31. For example, on or about September 3, 2022, ASSOCIATE 1 sent a message to YOUNES at telephone number 609-529-7646 asking for a link to the religious lectures to which they had listened together previously.

32. YOUNES responded in sum and substance, to click on the shaykhs name to locate particular lectures and indicated he had just listen to a lecture called "dust with never settle".

33. Based on my training and experience, as well as my knowledge of the investigation, "The Dust Will Never Settle" is a lecture by the late Anwar al-Awlaki, an American-Yemeni lecturer who was killed in Yemen in 2011 by a U.S. Government drone strike. According to the U.S. Government, al-Awlaki was a member of the Islamist militant terrorist group al-Qaeda. On or about July 16, 2010, the U.S. Treasury Department added al-Awlaki to the list of Specially Designated Global Terrorists.

34. The lecture was delivered in or around December 2007 following the publication of certain cartoons and drawings in European newspapers that were considered by Muslims to be disrespectful to Prophet Muhammad and sparked protests around the world. In the lecture, al-Awlaki quotes various Muslim scholars in support of the claim that the proper punishment for disrespecting Prophet Muhammad is death:

> And this is evidence that harming Allah and his Messenger is a reason to encourage Muslims to kill whoever does that . . .
>
> [t]he Prophet has issued his orders to kill anybody who speaks against him . . .

> Whoever curses the Messenger of Allah (peace and blessings of Allah be upon him) – a Muslim or a non-Muslim – then he must be killed[.] . . .
>
> It is the consensus of our scholars that the one who curses the Messenger of Allah (peace and blessings of Allah be upon him) should be executed . . . .
>
> The Book, Quran and *Sunnah*,[13] imply that whoever seeks to harm the Messenger of Allah (peace and blessings of Allah be upon him) or belittle him should be killed even if it is a very small thing[.]
>
> In fact . . . [i]f someone says that the button of the Messenger of Allah (peace and blessings of Allah be upon him) is dirty, then he should be executed[.] Even if it is as small as saying that, then this person should be executed[.]

35. In another example, on or about February 15, 2023, YOUNES sent ASSOCIATE 1 a message which was in reference to a shaykh which he described as very good who got his PhD from Medina who is currently in jail.

36. Based on my training and experience, as well as my knowledge of the investigation, the "shaykh" YOUNES is referring to in this message is Abdullah el-Faisal, born Trevor William Forrest, also known as Sheikh Faisal, a Jamaican Muslim cleric who was most recently convicted in or around January 2023 in New York state court for recruiting supporters and facilitating efforts to join ISIS and who was subsequently sentenced to 18 years in prison.[14] According to the Manhattan District Attorney's Office, the evidence at trial established that Sheikh Faisal had "used his public profile and personal network as the top English-speaking recruiter for ISIS to solicit and provide material support for the Islamic State's acts of violence and terrorism against others

[13] *Sunnah* is the body of traditions and practices of the Islamic prophet Muhammad.

[14] https://manhattanda.org/d-a-bragg-announces-all-count-trial-conviction-of-radical-cleric-shaikh-faisal-for-recruiting-supporters-and-facilitating-efforts-to-join-isis-2/ (last visited on August 26, 2025).

through . . . [among other things,] violent jihadist advocacy and ISIS recruitment through different writings, speeches and recordings, tradecraft instructions to others on how best to travel to Syria and Iraq to join ISIS and how best to avoid suspicion or arrest [. . .] creating opportunities for women jihadi aspirants to meet and marry ISIS adherents [and] inspiring others to commit their own violent acts in allegiance to ISIS[.]"[15]

37. YOUNES also advised ASSOCIATE 1 on how to choose a like-minded Muslim wife. For example, on or about June 3, 2023, YOUNES sent ASSOCIATE 1 an audio recording in which he stated, in sum and substance and in relevant part:

> . . . one last piece of advice I'd give you . . . what's like the best deed in this religion? The best deed is fighting *fi sabilillah*,[16] uhm, and then after that, who are the best people? . . . it's like the *ulama*,[17] but *ulama-e haqq*,[18] . . . the righteous *ulama* . . . if you really want [a good wife] associate yourself with . . . the rightous *ulama* [and] the *mujahidin*[19] . . . these people are like the best people in this *ummah*,[20] and it doesn't take like a rocket scientist . . . to look at our *deen*[21] . . . and see who Allah . . . loves the most. You know, the best

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[15] *See* fn. 13 above.

[16] An Arabic expression meaning "in the cause of God" or "for the sake of God."

[17] The *ulama* refers to a body of Muslim scholars recognized as having specialist knowledge of Islamic sacred law and theology.

[18] *Haqq* is Arabic for "truth" or "true."

[19] *Mujahid* (plural: *mujahidin*) is the Arabic word for "one who struggles" and refers to one who fights in battle. Based on my training and experience, in the context of ISIS propaganda, the term *mujahid* refers to a fighter engaged in a holy war against the perceived enemies of the Islamic State.

[20] *Ummah* is an Arabic term variably translated as Muslim identity, nation, religious community, or the concept of a Commonwealth of the Muslim Believers. It is a synonym for *ummat al-Islām* (the Islamic nation), and is commonly used to mean the collective community of Muslim people and transcends any national boundary.

[21] Arabic for "religion."

> people amongst the *sahabah*[22] were the people of Badr.[23] . . . this was the first battle and it was like against the odds, and they had to have a lot of courage, and a lot of like strength, to make that decision to fight by the side of the Prophet . . . [and] amongst the angels, the best angels were the ones that attended Badr with the *sahabah*, . . . where we are now, the best women are going to be amongst like the families of these people. . . . this the best advice I can give you, Shaheer, but it's not advice that we like, because . . . to be amongst these people [i.e., the scholars or the fighters], you have to sacrifice . . . .

38. It appears that YOUNES is telling ASSOCIATE 1 that his best choice of a spouse is the daughter of either righteous Islamic scholars or Islamist fighters. Based on my training and experience, the latter is a likely reference to ISIS fighters.

YOUNES's Travel to Turkey and Return to the United States

39. On or about September 4, 2022, YOUNES traveled from the U.S. to Turkey. While at the Newark Liberty International Airport and prior to boarding a Turkish Airlines flight to Istanbul, Turkey, YOUNES was interviewed by the United States Customs and Border Protection ("CBP"). YOUNES, who had no hotel reservations, stated that he was traveling to Turkey for one week for tourism and was going to "figure it out" when he arrived in Istanbul. YOUNES stated that he had no friends or family in Turkey and planned on traveling to Egypt where he did have family. YOUNES further stated that he had booked one-way flights for each leg of his travel and planned on returning to the United States on September 21, 2022, via the John F. Kennedy International Airport in New York.

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[22] The *Sahaba* (or *aṣ-ṣaḥāba*), literally "the companions," were the Muslim disciples and followers of the Islamic prophet Muhammad who saw or met him during his lifetime.

[23] The Battle of Badr was a military battle between the Islamic prophet Muhammad and the army of the tribe of Quraysh who opposed him. It was fought on March 13, 624 CE near the present-day city of Badr, Al Madinah Province, in Saudi Arabia. The Battle of Badr was the first large-scale engagement between the Muslims and Quraysh Meccans.

40. Travel records show that YOUNES did not return to the United States as he had stated. Instead, he remained in Turkey for over two years, and his U.S. passport, which expired on February 6, 2025, was never renewed. The investigation has also revealed that prior to leaving the United States for Turkey, YOUNES quit his job, sold his car, paid back his relocation reimbursement to his employer, and appears to have cashed out his retirement account. While in Turkey, YOUNES married a Turkish woman whom he claimed to have met through the mosque YOUNES attended in Turkey. They subsequently had a child.

41. This is further demonstrated through evidence obtained during the course of the investigation showing that YOUNES was increasingly disaffected with American society and no longer wished to reside in the United States. In messages YOUNES sent to ASSOCIATE 1 and others during the period that YOUNES was in Turkey demonstrate clearly that YOUNES considered Western societies to be godless and corrupt, and believed life in the West to be antithetical to leading a pious and religiously acceptable life. For example, on February 18, 2023, YOUNES posted a message in a group chat with a number of other individuals,[24] including ASSOCIATE 1. In sum and substance, the message stated "We can never enjoy the full benefit of Islam if we are living under democracy, communism, socialism, etc. The laws of the countries in

[24] This group chat was named "Ghurabah (strangers) Gathering" on or about October 22, 2022, by an individual using telephone number (609) 785-1803 and the WhatsApp handle "HIJAMA EXcorcist." On or about February 11, 2023, HIJAMA EXcorcist added YOUNES to the chat. In a message subsequently sent on or about February 11, 2023, HIJAMA EXcorcist wrote: "Everyone added has been to the Ghuraba gathering around the bonfire at least once! And I coinsider [sic] each of you close enlighten to me and intelligent enough to consider you an integral part of the mission of the prophet Muhammad may peace be upon him that I deeply desire to Emulate. One of the many efforts is this bon fire [sic] gathering." Based on my training and experience, *Ghuraba* or *Al-Ghurabaa* (Arabic for strange or weird) is an Islamic eschatological epithet mentioned in the hadith—a collection of traditions containing sayings of the prophet Muhammad—that describes the manner in which self-described upright Muslims are perceived by the wider society. Based on the messages posted by the participants, this group consisted of young Muslim men concerned with issues faced by others in their demographic group in Western society, including finding women who were suitable partners for them.

the Middle East are based on western law. They still maintain some aspects of Shariah law, however this not acceptable to Allah swt. We must submit entirely to Allah's swt shariah and not leave some and take some."

42. YOUNES further stated,[25] "It is not 'fitnah' to at the very least open dialogue about establishing the khilafah once again. Regime scholars use the words 'fitnah' and 'khwaariji' to silence anybody who speaks in opposition to them . Yes, these are legitimate terms. But they are abused in order to appease the rules in power and silence and sincere Muslims who want to live under Islam."

43. On or about February 25, 2025, YOUNES was arrested by Turkish authorities, who, YOUNES claimed, gave him the designation "G87." In my training and experience, Turkish security services use various codes for foreigners they deem a threat. Those thought to have ISIS links and who either remain committed to the group or have made suspicious new connections often receive the codes G87 or G89, with G87 code referring to "general security" and G89 to "foreign terrorist fighters." Persons designated with these codes cannot legally leave or enter the country or receive state-run education or health care.[26]

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[25] *Fitnah* is Arabic for, among other things, sedition or civil strife. In Islamic history, *fitna* specifically refers to civil wars within a Muslim community or society, notably the five civil wars of the Islamic Caliphate between the 7th and 9th centuries CE. *Khilafah* is Arabic for caliphate. *Khawaarij* (or *Khawarij*) is Arabic for "seceders" or "those who exit the community." It is used to refer to a group of Muslims who were initially followers of Ali, the fourth Islamic Caliph and Prophet Muhammed's son-in-law, but later rebelled against him.

[26] *See* "An Enduring Challenge: ISIS-linked Foreigners in Türkiye," International Crisis Group, Europe Report N°267, 28 February 2023.

44. YOUNES was subsequently deported to the United States, arriving at Newark Liberty International Airport in New Jersey on or about May 16, 2025. After his return to the United States, YOUNES resided with a relative at a residence in North Brunswick, NJ (the "North Brunswick Residence").

45. On or about July 17, 2025, the FBI executed warrants to search the North Brunswick Residence, the person of YOUNES, and electronic devices located at the North Brunswick Residence and/or on the person of YOUNES. The FBI additionally executed the warrant to search information associated with a Telegram Account on or about July 18, 2025.

46. Additionally, on and about July 18, 2025, the FBI collected an additional cell phone assessed to be used by YOUNES. Upon review of the phone, the FBI identified phone conversations wherein YOUNES sent an associate his support of al Awlaki's views on taxation and hijrah.

> 7/5/25: As for taxes[…] I take the shaykh's position that it is riddah[27] to pay in support of the militaries of the kuffar[.] […] I can't knowingly pay into fighting my deen/brothers/sisters[.]
>
> 7/5/25: I never gave you all details of the things I learned But I will say the kuffar are not as all seeing and hearing as ppl think they are[.] They spend billions to chase after a few thousand men and women in this world[.]
>
> 7/5/25: My life started when I left that stupid company [Messer] and made hijrah[.] I have a special dua between me and Allah swt. I wasn't gonna tell anyone. […] I ask for life But not as defined by kuffar[.] Life as defined by Islam. Life with purpose. Serving the deen and dying for it. This is truly life.
>
> 7/5/25: As shaykh anwar [al Awlaki] mentioned "Is fighting simply a means or is it in and of itself an end[.]" The answer is both[.] […] With hijrah It is the only thing that wipes away all

[27] "Riddah" is an Arabic term for renouncing or leaving one's religion or faith.

sins[.] The other 2 being an accepted hajj[28] and taking shahadah[.][29]

47. During the execution of premises search warrant, the FBI interviewed YOUNES and the other residents of the North Brunswick Residence, who were YOUNES' family members.

48. During the interview of YOUNES' uncle, Hasan Amer ("Amer"), Amer stated, in sum and substance, that YOUNES would no longer be allowed to stay at the North Brunswick Residence.

YOUNES's Relocation from New Jersey to Georgia

49. In late September 2025, YOUNES moved to the Clear Creek Apartment Complex, Apartment 924, located at 900 Central Lane, Lavonia, GA 30553, which was verified by records at the United States Postal Service. This address is located within the Middle District of Georgia. Prior interviews of YOUNES's associates suggest that family and friends were no longer willing to allow YOUNES to stay at their residences, which has caused YOUNES to find employment and living arrangements outside of New Jersey.

50. Also in late September 2025, YOUNES obtained employment at the Georgia Renewable Power Franklin Plant in Carnesville, Georgia. YOUNES works as a control room operator at the plant.

51. Also as of late September 2025, surveillance teams observed a paper shredder in the front seat of YOUNES's vehicle further identifying YOUNES's surveillance conscious behavior and desire to hide materials.

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[28] "Hajj" is the annual Islamic pilgrimage to Mecca.

[29] "Shahadah" is the Muslim profession of faith.

52. On November 13, 2025, local law enforcement responded to a domestic violence call at YOUNES's residence, 924 Clear Creek Apartment, Lavonia, Georgia. While lawfully present, boy camera footage of the officers interaction captured the interior of YOUNES's residence. Metal canisters were observed on the kitchen counter, next to an array of tools to include sockets, wrenches, electrical tape and a black laptop. FBI Special Agent Bomb Technicians reviewed the footage and could not determine whether the items were of immediate concern.

53. On October 10, 2025, YOUNES purchased an additional cellular phone in person at a Metro by T-Mobile Store in Commerce, Georgia ("the Secondary Cell Phone"). When asked for identification YOUNES did not provide any identification and instead made the purchase under a purported business name "Addys Construction," provided a Carnesville, Georgia address, and email address adconstruction3402@gmail.com. FBI conducted open-source searches of those facilities/identifiers and produced no results. FBI also conducted searches on the Georgia Department of State business holdings, again producing no results. Additionally, YOUNES is not associated with any business related to construction.

54. On March 16, 2026, the FBI received Grand Jury subpoena returns from Pinnacle Bank pertaining to two checking accounts held by YOUNES. YOUNES was the sole account owner for both, and his Cell Phone was listed as the home phone and mobile phone for the accounts.

55. On March 27, 2026, during physical surveillance conducted on YOUNES, Agents observed YOUNES at the Al-Quba Mosque in Sugar Hill, GA speaking with an unidentified male. After the conversation concluded, the unidentified male entered a blue Lexus sedan bearing GA license plate SFS-6259. Records queries for GA license plate SFS-6259 show that it is associated with Sultane Salim ("SULTANE"). In 2018 SULTANE, along with his brother Asif

Salim ("ASIF") and another individual, pleaded guilty to one count of Concealment of the Financing of Terrorism (2339C(C)(2)(B)), for their roles in concealing the provision of thousands of dollars to Anwar Al-Awlaki in an effort to support violent jihad against U.S. military personnel in Iraq, Afghanistan, and throughout the world. As mentioned above, according to the U.S. Government, al-Awlaki was a member of the Islamist militant terrorist group al-Qaeda who was on a list of Specially Designated Global Terrorists before he was killed in Yemen in 2011 by a U.S. Government drone strike.

56. On April 17, 2026, Agents on physical surveillance observed YOUNES at the Al-Quba Mosque in Sugar Hill, Georgia shaking hands and talking with ASIF. As mentioned above, ASIF and SULTANE were identified because they are already known to the FBI and have already been convicted of terrorism charges.

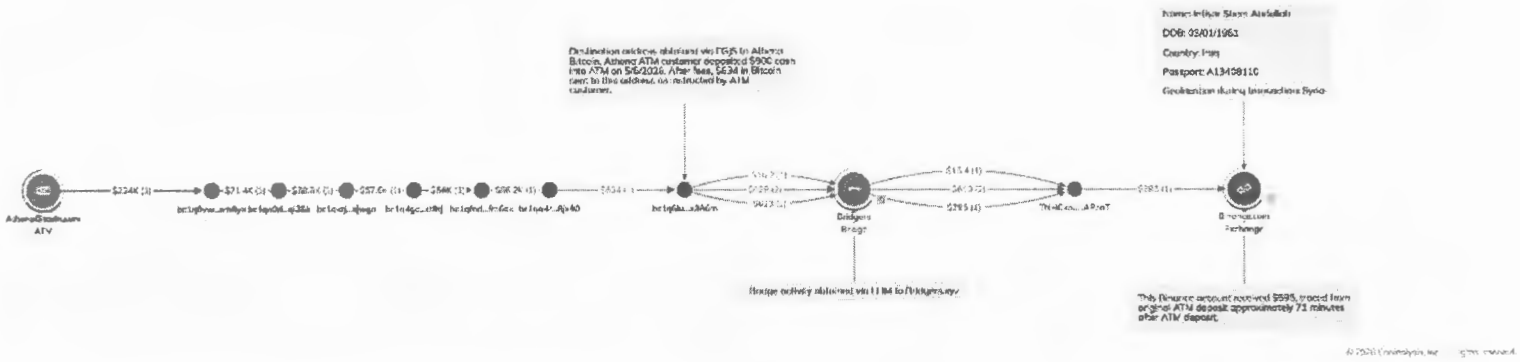
YOUNES's Cash Payments through Athena Bitcoin ATMs

57. On April 10, 2026, during physical surveillance conducted on YOUNES, Agents observed YOUNES driving to a Pinnacle bank in Lavonia and withdrawing cash. YOUNES then drove to Al-Quba Mosque in Sugar Hill, GA. YOUNES then left the mosque, drove to a gas station convenience store in Lawrenceville, GA, and made a deposit into a Bitcoin ATM.

58. On or around July 17, 2026, the FBI received Grand Jury subpoena returns from Pinnacle Bank regarding YOUNES's accounts. According to the returns, on May 1, 2026, YOUNES withdrew $1,000 from the Pinnacle Bank ATM located in Lavonia, Georgia.

59. On or around September 4, 2026, the FBI received Grand Jury subpoena returns from Athena Bitcoin. According to the returns, on May 6, 2026, YOUNES deposited $900 cash into an Athena ATM at 2922 West Main Street, Royston, GA, 30662, located within the Middle District. Blockchain analysis and additional subsequent legal process completed by the FBI shows

the funds were traced to a cryptocurrency wallet owned by Iraqi national, Intisar Sheet Abdullah. Internet Protocol ("IP") tracing done by the FBI shows the ending cryptocurrency wallet was historically accessed in multiple cities within Syria, to include Damascus, Aleppo, and Tartus. A visual depiction of the cryptocurrency tracing conducted to date regarding this transaction is included below:



60. YOUNES was identified as the sender of the funds, based on video surveillance footage provided by Athena Bitcoin, as pictured below:

05/06/26:



61. According to the response from Athena Bitcoin, users must authenticate the financial transaction at an ATM kiosk through text verification. On May 6, 2026, transaction records indicated that YOUNES verified the transaction using telephone number, 678-630-2490,

which according to Athena Bitcoin third party company Telesign[30], is registered to a "Rolando Payne." No known connection between "Rolando Payne" and YOUNES exists. Based on his known use of secondary phones, FBI assessed this as the burner phone number YOUNES utilized during this time period.

62. On or around September 4, 2026, the FBI received Grand Jury subpoenas indicating between December 21, 2025, and June 10, 2026, YOUNES sent a total of $16,807 cash through Athena Bitcoin ATMs within Georgia, to include additional transactions sent from the Middle District of Georgia. While FBI financial analysis regarding these transactions is ongoing, records show YOUNES is identified through ATM video surveillance photos as indicated below. During these 11 transactions, YOUNES utilized six secondary phone numbers, assessed by the FBI to be subsequent burner phones, none of which are registered in his true name. Again, further indicating YOUNES's need to obfuscate his actions from law enforcement:

12/21/25:



[30] Telesign is a U.S. based company that provides digital verification services to assist companies with fraud prevention.

02/18/26:



02/27/26:



03/13/26:



04/03/26:



04/06/26:



04/10/26:



05/24/26:



06/01/26:



06/10/26:



YOUNES's Conversations with Confidential Human Source

63. Beginning on or about November 15, 2025, and continuing through at least October 21, 2026, an FBI confidential human source ("CHS") communicated with YOUNES through WhatsApp and through consensually monitored in-person meetings. Over the course of the relationship, YOUNES discussed with CHS his radical viewpoints, support for ISIS, and described his motivations for making the international financial transactions described herein. CHS is known to the FBI and has a history of providing credible and reliable information. CHS is paid for assisting the Government with investigations. The information provided by CHS cited here has been verified by the FBI to the extent possible. CHS does not have a criminal history.

64. On and around May 13, 2026, YOUNES and the CHS met near Lawrenceville, Georgia. During this meeting, YOUNES disclosed he had previously lived in Turkey and was forced to leave. In sum and substance, YOUNES stated he was put into a car, beaten up, and taken to a deportation center for three months. After discussion with his family he realized he could not support his family while in the center and left. YOUNES stated the Turkish government deported him after being designated a deportation code associated with ISIS.

On and around June 8, 2026, YOUNES discussed with the CHS in sum and substance the importance of supporting the Deen[31] and stated, "If we're not like actually like uh spilling our blood, if we're not actually like you know - standing up for like the men and women that are oppressed, standing up for Allah's Deen, then like what are we gonna go in front of Allah with? You know when we meet him?" YOUNES again discussed with the CHS his motivations for making the international financial transactions described herein.

65. YOUNES went on to state:

"YY: There's a lot of uh - there's a couple of different uh ya'ni - families um that I know of personally um and some of them, yeah are families of mujahideen. And when I am talking about mujahadeen, I am talking about Dawla Islamiyah[32](Islamic State). I am not talking about like Hamas. I am not talking about like these other. I am talking about people who are actually fighting to establish Sharia, actually fighting for the Deen of Allah um and uh ya'ni - some of them are just like you know - maybe the husbands were living civilian lives, but the – you know - like I was telling you with work – like working here um even if you like try to keep to yourself, even if you - you know - you're gonna wind up in a situation like you - you were in where it's like you either throw away your deen, your 'Izzah (pride) and you know - swallow it. And uh just do it for the sake of the job – do it for the sake of like your Dunya. Or you like a sacrifice and you lose um – The reason I'm bringing this up is like, even some of these people - you know - the men uh ya'ni. They would be doing things like uh - like maybe doing things like sending money, which is like kind of benign. And then they're sending it to women and children, which is also something benign – it's not – ya'ni - like you wouldn't classify this as an aggressive thing, but because of these

[31] "Deen" in Arabic translates to "religion" and "way of life" in which a person lives their life in support of Allah.

[32] [32] *Dawla al-Islamiyya* is a designated alias for ISIS as mentioned above in Fn. 1.

people who are from a certain like uh ya'ni - like group - this is uh the kuffar. They don't have any tolerance for this type of uh thing. So, then you're slapped with you know this and this and this and you know it's sijin."

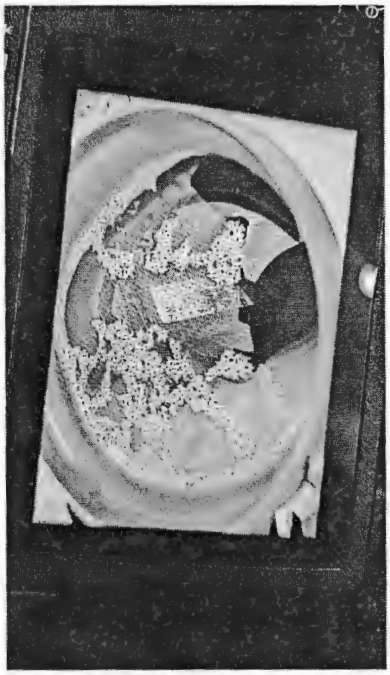
66. When describing how YOUNES sends the money overseas, YOUNES stated in sum and substance that there are cryptocurrency ATMs available to send cash overseas. YOUNES goes on to explain he knows people overseas and when he is ready to send money he asks for a wallet address. YOUNES stated, "The only way I can do it is like through the people I have. And I would just ask for one and they would give it to me. And give me the other wallet address. And I put in that and you know whatever I want and then from there you know - dictate to them - this is the recipient address, so they just send it from the first address to the recipient address".

67. During the above-mentioned June 8, 2026, CHS meeting, YOUNES also discussed with the CHS how he purchases a burner phone every month. YOUNES shared how he disposes of his burner phones by using a saltwater mixture to destroy the components before throwing away the phone. This further shows YOUNES's need for obfuscating his money transactions from law enforcement and corroborates the multiple phone numbers associated with YOUNES's cryptocurrency ATM transactions.

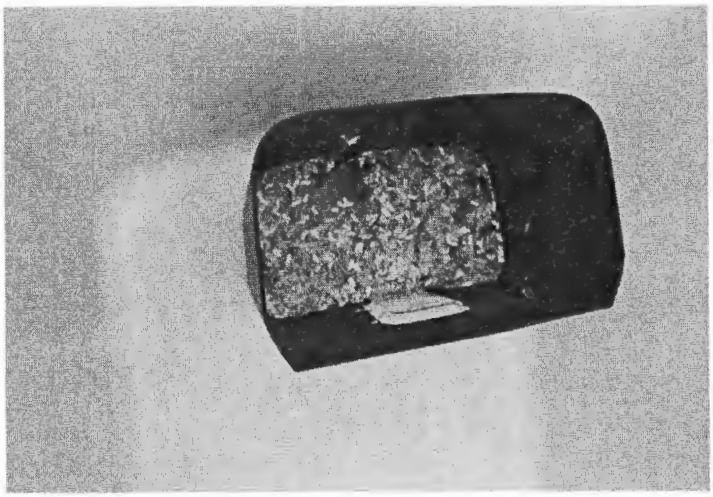
68. On or about November 18, 2026, the FBI executed warrants to search YOUNES's residence, person, vehicle, work and devices. Within the residence, FBI located a Maxwell coffee can with what appeared to be several cellular devices submerged in an unknown solution. After the search, items within the can were identified to be approximately three cellular phones taken apart, with on at least one occasion an identification number removed and another of the cell phones appears smashed. The solution was tested by the FBI but the substance could not be confirmed. FBI is currently working to determine the number of cellular devices

contained inside the bucket, what information is contained on the cellular phones and is working to identify the chemical composition of the unknown solution.





69. Also, located within the residence was a paper shredder inside of the shower full of liquid (which is believed to be water) and what appeared to be shredded paper. FBI interviewed YOUNES's mother, Arlene MUTZ (MUTZ) who stated, YOUNES believes water removes the ink. FBI is currently working to determine the content of the items shredded.





V. CONCLUSION

Based on the foregoing, I submit that probable cause exists to support the charge against Younes Moustafa Younes for violations of Title 18, United States Code, Sections 1512(c) and 1956(a)(2) (Destruction of Evidence and Money Laundering).

VI. REQUEST FOR SEALING

70. I further request that the Court order that all papers in support of this Criminal Complaint and Arrest Warrant, including this Affidavit, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give targets an opportunity to flee/continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, notify

confederates, or otherwise seriously jeopardize the investigation.

Kate Palmquist
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me ~~by telephone~~ on November 19, 2026.

CHARLES H. WEIGLE
UNITED STATES MAGISTRATE JUDGE