

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.
v. :
: Mag. No. 25-11260
TOMAS-KAAN JIMENEZ-GUZEL : CRIMINAL COMPLAINT
and :
SAED ALI MIRREH :
:

I, Dylan James Cochran, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

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

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Dylan James Cochran

Dylan James Cochran, Special Agent
Federal Bureau of Investigation

Special Agent Cochran attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 5th day of November, 2025.

/s/ André M. Espinosa

Hon. André M. Espinosa
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

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

From a date unknown, but by at least on or about July 24, 2025, to on or about November 4, 2025, in the District of New Jersey and elsewhere, the defendants,

**TOMAS-KAAN JIMENEZ-GUZEL
and
SAED ALI MIRREH**

with others known and unknown, knowingly conspired to provide “material support or resources,” as that term is defined by Title 18, United States Code, Section 2339A(b)(1), namely, personnel (to include themselves and others), to a foreign terrorist organization, namely the Islamic State of Iraq and al Sham, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism.

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

COUNT TWO
(Attempt to Provide Material Support to a Designated Foreign Terrorist Organization)

From on or about October 4, 2024, to on or about November 4, 2025, in the District of New Jersey and elsewhere, the defendant,

TOMAS-KAAN JIMENEZ-GUZEL

knowingly attempted to provide “material support or resources,” as that term is defined by Title 18, United States Code, Section 2339A(b)(1), namely, personnel (to include himself and others), to a foreign terrorist organization, namely the Islamic State of Iraq and al Sham, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism.

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

ATTACHMENT B

I, Dylan James Cochran, am a Special Agent of the Federal Bureau of Investigation (“FBI”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Some of the quotations contained in this affidavit are based on preliminary FBI transcriptions and, in some cases, including preliminary translations of certain words or phrases from Arabic to English.

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

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

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

3. On or about October 15, 2004, the U.S. Secretary of State (“Secretary”) designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’l-Jihad, as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist (“SDGT”) under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”)

as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (*i.e.*, “ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production.

4. On or about September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On or about March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

SUMMARY OF PROBABLE CAUSE

5. From a date unknown, but by at least on or about July 24, 2025, to on or about November 4, 2025, through communications on encrypted messaging applications, Tomas-Kaan Jimenez-Guzel (“JIMENEZ-GUZEL”), SAED ALI MIRREH (“MIRREH”), and other co-conspirators agreed to travel to Turkey in November 2025. They also agreed with other co-conspirators to subsequently travel to “sham”¹ to join ISIS as fighters, and to thereby provide themselves and others as personnel to ISIS.

6. On or about October 27, 2025, JIMENEZ-GUZEL purchased an airline ticket to depart from Newark Liberty International Airport (“Newark Liberty Airport”) to Istanbul, Turkey on or about November 17, 2025. On or about October 28, 2025, MIRREH purchased an airline ticket to depart from Seattle-Tacoma International Airport (“Seattle-Tacoma”) to Istanbul, Turkey on or about November 16, 2025.

7. After other individuals residing in Dearborn, Michigan, with whom JIMENEZ-GUZEL and MIRREH were communicating, were arrested on October 31, 2025, and charged with offenses related to those individuals’ plot to carry out an armed attack on behalf of ISIS, JIMENEZ-GUZEL, MIRREH, and their co-conspirators accelerated their travel plans. On or about November 3, 2025, JIMENEZ-GUZEL re-booked his flight from Newark Liberty Airport to Istanbul, Turkey to depart instead on or about November 5, 2025 (in the early morning hours, shortly after midnight on November 4, 2025). Then on or about November 4, 2025, after communicating with JIMENEZ-GUZEL and other co-conspirators, MIRREH

¹ Based on my training, experience, and knowledge of this investigation, I believe that “sham” is an Arabic word that refers to the historical region known as greater Syria. This region includes modern day Syria, Lebanon, Jordan, Palestine, and parts of southern Turkey.

booked an additional flight from Seattle-Tacoma to Istanbul, Turkey to depart on or about November 5, 2025. JIMENEZ-GUZEL was arrested at Newark Liberty Airport on November 4, 2025 after he arrived for his booked flight. MIRREH was arrested later that evening at his home in Washington State.

8. Leading up to their arrests, during their communications with each other and other co-conspirators over at least the last several months, JIMENEZ-GUZEL, MIRREH, and other co-conspirators agreed to, and discussed, comprehensive plans to complete hijrah² and jihad³ in or around November 2025. JIMENEZ-GUZEL, MIRREH, and others also discussed, among other things, detailed travel plans, physical training, weapons including firearms and improvised explosive devices (“IEDs”), and how to avoid detection by law enforcement. The communications included, among other things, a photograph of JIMENEZ-GUZEL in front of the ISIS flag while holding a knife, a photograph of MIRREH wearing an ISIS hat, JIMENEZ-GUZEL volunteering to be the individual to commit beheadings, MIRREH stating that everyone has to be prepared to “unalive” someone, MIRREH sending ISIS-related videos and a video and a photograph of a gun, and MIRREH and JIMENEZ-GUZEL stating that they each took an oath, likely referring to an oath of loyalty to ISIS.⁴

BACKGROUND

9. JIMENEZ-GUZEL is a 19-year-old resident of Montclair, New Jersey and Glassboro, New Jersey. MIRREH is a 19-year-old resident of Kent, Washington. Both JIMENEZ-GUZEL and MIRREH are U.S. citizens. As discussed further below, JIMENEZ-GUZEL and MIRREH have used numerous social media platforms and messaging applications to discuss their support for ISIS and Islamic extremism, and to discuss and plan their travel to join ISIS overseas.

Background on MIRREH

10. In August 2023, the FBI executed a search warrant for MIRREH’s residence in Kent, Washington based on information indicating that MIRREH, who

² Based on my training, experience, and knowledge of this investigation, I believe that “hijrah” is an Arabic term that refers to migration, but which is often used by those with extremist views to describe a foreign fighter’s journey abroad to wage jihad.

³ Based on my training, experience, and knowledge of this investigation, I believe that “jihad” is a holy war against the enemies of Islam.

⁴ Based on my training, experience, and knowledge of this investigation, I believe that “oath” is a reference to the oath or pledge of allegiance that individuals make to ISIS.

was then a minor, was discussing conducting attacks in the United States on behalf of ISIS in an online chat group, as well as potentially providing support to a juvenile in Canada who was arrested by Canadian authorities in connection with terrorism charges. MIRREH was interviewed by the FBI at that time and admitted to sending messages to others about a potential attack and consuming ISIS propaganda but denied intending to carry out an attack. The FBI also interviewed MIRREH in January 2024, at which time MIRREH denied having further contact online with members of pro-ISIS online groups, with the exception of one username MIRREH recognized as having been a member of the same pro-ISIS groups MIRREH associated with. MIRREH further told the FBI that he blocked this username after recognizing it.

11. On July 3, 2025, the FBI received additional information indicating that since his 2023 and 2024 interviews by the FBI, MIRREH continued to participate in online communications with other pro-ISIS extremists regarding committing jihad against the “kuffars,”⁵ and that he is in possession of firearms.

12. Specifically, on June 27, 2025, the FBI issued an Emergency Disclosure Request (“EDR”) to social media company Meta Platforms Inc. (“Meta”) for information associated with Instagram account s*****⁶, which has historically been associated with MIRREH. The FBI knows Instagram account s***** belongs to MIRREH because MIRREH disclosed to the FBI that he created this account during his interview in January 2024.

13. Analysis of the EDR returns revealed that MIRREH, using Instagram account s*****⁶, was in direct communication with at least 3 known overseas ISIS supporters and a participant in conversations pertaining to jihad against the “kuffar [non-believers]” martyrdom, violence against Jewish people, purchasing plane tickets to travel overseas, and training at gun ranges. Additionally, MIRREH and other participants in these online conversations shared photos of knives and military vests. Also present in the EDR returns from MIRREH’s Instagram account was other extremist content to include a video posted on June 2, 2025, of MIRREH in a vehicle wearing body armor repeatedly yelling “Allahu Akbar,” with what appears to be a gun case in the passenger seat.

⁵ Based on my training, experience, and knowledge of this investigation, I believe that “kuffar” is an Arabic term that refers to disbelievers, or someone who rejects or does not believe in Islam.

⁶ In an effort to maintain confidentiality and protect an ongoing investigation, online usernames and monikers are anonymized in this Complaint.

Background on JIMENEZ-GUZEL

14. On or about October 2, 2024, user M*****⁷, who was later determined to be JIMENEZ-GUZEL, indicated that a newsworthy event would be occurring in Boston during another user's live stream in which the user discussed politics on a social media platform ("Social Media Platform 1").⁷

15. JIMENEZ-GUZEL stated: "Ameeica [sic] is next. In 2 weeks, we will be all over the news in Boston[.]" On or about October 4, 2024, the FBI interviewed JIMENEZ-GUZEL at his residence. During the interview, JIMENEZ-GUZEL acknowledged, among other things, that he was user M*****⁷ and that he made the aforementioned statement.

16. As indicated above, and as more specifically detailed below, from between on or about October 4, 2024, to on or about June 17, 2025, JIMENEZ-GUZEL and another New Jersey-based individual ("Co-Conspirator 1"), communicated with each other via direct messaging on another social media platform ("Social Media Platform 2"),⁸ about foreign terrorist organizations, suicide bombings, and the desire to travel and to commit jihad.

17. On or about May 19, 2025, an FBI confidential human source ("CHS-1")⁹ with whom JIMENEZ-GUZEL had been in communication, took a screenshot of a post that JIMENEZ-GUZEL had made on Social Media Platform 1 using display name A** H*****.

18. The post included an image of a document in Arabic entitled in English "KILL THEM SILENTLY." The document encouraged Muslims to practice the obligation of jihad and terrorize the disbelievers to avenge their Muslim brothers. It also urged the use of knives, axes, and vehicles to attack Christians and Jews, and suggested that all that was needed was a knife, hammer, or even less to cause chaos and destruction on a large scale across Europe and America.

⁷ Social Media Platform 1 is a video-sharing social media application. It is used to create, watch, and share short-form videos and interact with other users.

⁸ Social Media Platform 2 is a social media platform where users can share messages, multimedia, and other information with other users and the general public.

⁹ CHS-1 is cooperating with law enforcement and is a validated and vetted source.

19. On or about June 23, 2025, user A** H*****, who was later determined to be JIMENEZ-GUZEL, sent a message on Messaging Application 2¹⁰ to an individual (“Individual 1”), asking Individual 1 if he/she wanted to “make hijrah” with him to Libya. JIMENEZ-GUZEL then stated that “[t]here’s a d¹¹ compound there[.]”

20. JIMENEZ-GUZEL later stated to Individual 1: “[b]ro I look like a full on member,” likely referring to an ISIS member. JIMENEZ-GUZEL then sent a photograph of himself with a blurred face. Among other things, JIMENEZ-GUZEL later stated: “Bro i [sic] fr [for real] wanna make hijrah so bad,” and that he wanted to go with someone “[n]ot by myself.”

21. On or about July 4, 2025, JIMENEZ-GUZEL boarded a flight from Newark Liberty Airport in Newark, New Jersey to Istanbul, Turkey.

22. While in Turkey, on or about July 6, 2025, JIMENEZ-GUZEL sent a message on Messaging Application 2 to Individual 1, which he described as “[m]y [f]inal letter.” Among other things, JIMENEZ-GUZEL stated:

I've chosen the path of Jihad fi Sabilillah,¹² the path to Jannah,¹³ to claim the honor which Muslimeen¹⁴ once had . . . I want this message to reach to all of you[.] I want my little story to motivate you into making hijrah, and following the steps of the Sahaba¹⁵ . . . I have just 1 request from those who read this[.] Please try to make hijrah, please do everything you[.]

¹⁰ Messaging Application 2 is an end-to-end encrypted messaging and telephone application. It can be installed on cellular telephones, desktop computers, or tablets, and synced across multiple devices.

¹¹ Based on my training, experience, and knowledge of this investigation, I believe that “d” is a reference to “daesh” or “dawla,” which are terms that commonly refer to ISIS.

¹² Based on my training, experience, and knowledge of this investigation, I believe that “Jihad fi sabilillah” is an Arabic phrase meaning “struggle in the path of Allah” or “for the sake of Allah.”

¹³ Based on my training, experience, and knowledge of this investigation, I believe that “Jannah” is the Islamic concept of Heaven or Paradise.

¹⁴ Based on my training, experience, and knowledge of this investigation, I believe that “Muslimeen” is the plural of the Arabic word for Muslim.

¹⁵ Based on my training, experience, and knowledge of this investigation, I believe that “Sahaba” refers to the companions of the Islamic prophet Muhammad.

23. On or about August 24, 2025, JIMENEZ-GUZEL returned to Montclair, New Jersey.

24. On or about August 28, 2025, JIMENEZ-GUZEL began undergraduate studies at a local university and moved to Glassboro, New Jersey. Since that time, JIMENEZ-GUZEL has continued to communicate with MIRREH, the CHS, and other co-conspirators regarding his plans to travel to ISIS territory in Syria to engage in violent jihad on behalf of ISIS.

JIMENEZ-GUZEL AND OTHER CO-CONSPIRATORS DISCUSS THEIR PLANS TO TRAVEL TO FIGHT FOR ISIS OVERSEAS

25. As described further below, beginning in at least July 2025, JIMENEZ-GUZEL and MIRREH communicated with each other and other co-conspirators located in the United States and overseas regarding their agreement and plans to travel to the Middle East—ultimately Syria—for the purpose of joining ISIS and engaging in violent jihad on ISIS's behalf.

July 15, 2025: “We aren’t going straight onto a battlefield...But at one point...yes”

26. On or about July 15, 2025, while in Turkey, JIMENEZ-GUZEL communicated with CHS-1 on Messaging Application 1.¹⁶ During the communication, JIMENEZ-GUZEL, who was using the display name *, told CHS-1 that he planned on making hijrah and invited CHS-1 to join him and others.

27. JIMENEZ-GUZEL explained that he planned to go to Egypt with some ikhwa¹⁷ and that they were going to meet halfway. JIMENEZ-GUZEL stated that he had to “make sure everything is set” and “[w]e aren’t going straight into a battlefield rn [right now].” JIMENEZ-GUZEL then stated: “But at one point ان شاء الله [God willing] yes” and “[l]ike later if الله [God] wills[.]”

¹⁶ Messaging Application 1 is an end-to-end encrypted messaging and telephone application. It can be installed on cellular telephones, desktop computers, or tablets, and synced across multiple devices.

¹⁷ Based on my training, experience, and knowledge of this investigation, I believe that “ikhwa” is an Arabic term that means “brothers” or “brotherhood.”

¹⁸ The Arabic text described herein was translated by an FBI language specialist to English.

28. In response to CHS-1 asking whether there would be training regarding weapons such as an AK45, JIMENEZ-GUZEL said, in relevant part, that the training would be provided later and:

[t]he hijrah will be about establishing a community
 And being around many brothers
 Gaining knowledge
 Marriage
 Ann [sic] then we

Yk [you know]
 J¹⁹ [.]

July 16, 2025: "...so once things start happening, then inshallah we all go"

29. On or about July 16, 2025, JIMENEZ-GUZEL invited CHS-1 to join a group chat on Messaging Application 1.

30. In response to CHS-1 asking if it was safe to discuss hijrah, JIMENEZ-GUZEL stated: "Akhi [my brother] just don't say crazy hot stuff yk [you know]" and "Don't mention d²⁰ [dawla or daesh]"

31. JIMENEZ-GUZEL also sent numerous audio messages directly to CHS-1, referencing jihad and hijrah.

32. JIMENEZ-GUZEL told CHS-1:

we are just organizing things slowly... we need trust...

for sham, we need to wait because sham is very unstable right now so once things start happening, then inshallah we all go. Right now, it's about the hijrah.. it's about actually establishing community and then when we need to go for J [jihad] inshallah [God willing], we go akhi [my brother].. that's the ... that's like the motive right now, akhi [my brother]

¹⁹ Based on my training, experience, and knowledge of this investigation, I believe that "J" is commonly used to refer to "jihad."

²⁰ Based on my training, experience, and knowledge of this investigation, I believe that "d" is likely a reference to "dawla" or "daesh," which are other words used to refer to ISIS.

. . . you can claim to be part of the manhaj²¹ but if I don't see that willingness out of you, like you're not really willing to make hijrah, not willing to do J [jihad], I can't . . . I can't trust you like that . . .

33. JIMENEZ-GUZEL also sent an audio message to CHS-1, stating, in relevant part:

I haven't posted anything where I am. I haven't even used the word hijrah. I just said I left. That's not enough. They can't really pin me on anything. . . . about the Egypt thing? . . . No one publicly knows . . . what's risky is . . . posting nasheed edits,²² d edits.²³ That stuff is risky. That stuff is gonna put us at risk and obviously saying oh guys, I'm making hijrah, I'm leaving. . . .

34. JIMENEZ-GUZEL later sent another audio message to CHS-1, describing himself as the recruiter. JIMENEZ-GUZEL also stated, in relevant part, that they would leave within a year, but he did not know when because:

one of the brothers can make a lot of money with his business. He's gonna be scamming some Yahud²⁴ and if he succeeds he can make like over 100k from this and we can use that so much, which is gonna help the Mujahideen²⁵ and stuff. So, just save money bro, don't spend on dumb stuff[.]

²¹ Based on my training, experience, and knowledge of this investigation, I believe that "manhaj" is an Arabic term that encompasses various aspects of Islamic life and practice. It often refers to the methodology or approach used in understanding and practicing Islam.

²² Based on my training, experience, and knowledge of this investigation, I believe that "nasheed edits" likely refers to works of vocal music that are associated with Islam.

²³ Based on my training, experience, and knowledge of this investigation, I believe that "d edits" likely refers to videos or propaganda from ISIS.

²⁴ Based on my training, experience, and knowledge of this investigation, I believe that "Yahud" is an Arabic term for Jewish people.

²⁵ Based on my training, experience, and knowledge of this investigation, I believe that "mujahideen" is an Arabic term that refers to individuals who engage in jihad.

July 17, 2025: "Akhi this is a hijeah [hijrah] chat"

35. On or about July 17, 2025, CHS-1 and an FBI undercover covert employee ("UCE-1") joined a group chat on Messaging Application 1, named "P*****T****" ("Group Chat 1").

36. On or about that date, in Group Chat 1, JIMENEZ-GUZEL instructed his co-conspirators not to "mention any group or state by name."

37. Thereafter, in Group Chat 1, in response to JIMENEZ-GUZEL discussing how much money should be brought, UCE-1 asked JIMENEZ-GUZEL the purpose of the group chat. JIMENEZ-GUZEL then instructed UCE-1 to message him privately on Messaging Application 1.

38. In private messages between JIMENEZ-GUZEL and UCE-1, JIMENEZ-GUZEL told UCE-1: "Akhi [my brother] this is a hijeah [sic] chat." JIMENEZ-GUZEL later explained that the purpose of the group was to leave the United States and "make hijrah[.]"

39. In response to UCE-1 discussing Egypt, JIMENEZ-GUZEL further explained: "[w]e want to make hijeah [sic] to that region akhi [my brother.] But with more money[.]" "So it will be easier [God willing] [.]"

July 18, 2025: "...things are starting to grow in sham...The gates of J [jihad] [God willing] opening"; "this hijrah is just a gateway to J"

40. On or about July 18, 2025, in Group Chat 1, UCE-1 asked about the anticipated time frame for hijrah. JIMENEZ-GUZEL responded, in relevant part, that the "time limit" was a year, and that some individuals are making hijrah before then. JIMENEZ-GUZEL stated, in relevant part: "[b]ut things are starting to grow in sham . . . The gates of J [jihad] [ان شاء الله] [God willing] opening[.]

41. JIMENEZ-GUZEL and his co-conspirators then discussed the logistics of traveling in groups and living arrangements. JIMENEZ-GUZEL later announced:

[t]he main objective is to establish presense [sic] rn [right now]
 A community
 And more and more ppl [people] come
 And when the gates open in sham
 Yes
 It's calculated and not wreckless [sic]
 It's smarter for ikhwa [brotherhood] to all go to the same place

Then [sic] to spread out[.]

42. JIMENEZ-GUZEL also stated in Group Chat 1, among other things:

[b]ut as a general rule from my knowledge, hijrah is a fardh,²⁶ you are not allowed to live in the land of kufr,²⁷ you are not allowed to pay tax and aid kufr. And plus this hijrah is just a gateway to J [jihad] which in our times is fard alayn²⁸ since Muslims are attacked everywhere and imprisoned everywhere[.]

July 19, 2025: "The time stamp" for hijrah is "4 months to 1 year"

43. On or about July 19, 2025, in Group Chat 1, while discussing travel, JIMENEZ-GUZEL suggested that he and his co-conspirators should travel in groups of two because more than three would be suspicious. JIMENEZ-GUZEL also sent a photograph that included a partial image of his passport including a passport photo that was partially covered by red ink. He stated: "I'm fr [for real] cooked" "Bro this passport picture .

44. Thereafter, JIMENEZ-GUZEL stated that he was "gonna figure out how to get to sham from Egypt," "Sorry," and "Egypt to sham." He also stated that he had to train his co-conspirators because "[s]ome of yall are gonna def shoot someone by accident . . . [b]ros gonna point his gun to my foot."

²⁶ Based on my training, experience, and knowledge of this investigation, I believe that "Fardh" is an Arabic term that refers to an obligatory religious duty commanded by God.

²⁷ Based on my training, experience, and knowledge of this investigation, I believe that "Kufr" is an Arabic term that means "disbelief" or "ingratitude." It refers to the rejection or denial of the fundamental beliefs of Islam, including the oneness of God (Allah) and the prophethood of Muhammad.

²⁸ Based on my training, experience, and knowledge of this investigation, I believe that "Fard alayn" is an Arabic term that refers to religious duties that are obligatory for every individual Muslim to perform.

²⁹ Based on my training, experience, and knowledge of this investigation, I believe that the photograph is of JIMENEZ-GUZEL's Spanish passport based on the partial text stating, in relevant part, "REINO DE ESPAÑA," and "JIME" and "GUZE," which are the beginning letters of JIMENEZ-GUZEL's last name.

45. JIMENEZ-GUZEL and his co-conspirators then discussed living arrangements, and JIMENEZ-GUZEL suggested that they split rent for one or two apartments. JIMENEZ-GUZEL also sent videos of apartment options.

46. JIMENEZ-GUZEL continued discussing options for living arrangements, including suggesting that they go to villages because he “know[s] some guys there.” JIMENEZ-GUZEL then stated that they can “learn to shoot.” He further stated:

[u]r gonna train basically
But make sure
For this year . . .
Or howveee [sic] months
U seek ilm³⁰
As much as u can

47. JIMENEZ-GUZEL subsequently stated that “[t]he time stamp” for hijrah is “4 months to 1 year.”

July 20, 2025: “[I] want to be second in command”

48. On or about July 20, 2025, JIMENEZ-GUZEL sent a direct message on Messaging Application 1 to CHS-1 including a photograph of himself with a blurred face while sitting in front of what appeared to be an ISIS flag and holding a knife upright in his left hand.

³⁰ Based on my training, experience, and knowledge of this investigation, I believe that “ilm” is an Arabic term that translates to “knowledge.” In an Islamic context, “ilm” typically refers to religious knowledge, encompassing both theoretical understanding and practical application.

49. Below is a screenshot of the image:



50. In Group Chat 1, JIMENEZ-GUZEL and his co-conspirators discussed who would be the group leader, and JIMENEZ-GUZEL stated that he “want[s] to be second in command.” A separate group on Messaging Application 1 was created for the purpose of voting. Ultimately, after voting, Co-Conspirator 3, located in Sweden, was elected to be group leader and JIMENEZ-GUZEL was discussed as being second in command.

51. JIMENEZ-GUZEL later volunteered to be cameraman, and noted that the “(cameraman will indeed eventually die).” He also stated that he did not think that they should bring their phones with them, and that if they did, “then we should break them in the airport” “in toilets or smthn [something] else.” Group Chat 1 members then discussed the backstory for their travel and Co-Conspirator 4, located in the United Kingdom, proposed that it will be about learning Arabic.

52. JIMENEZ-GUZEL provided a phone number in Group Chat 1 and described it as “my number,” stating: “Yall can have my number[.]” He provided a phone number ending in -7846” (“the 7846 Phone Number”).

53. The 7846 Phone Number was the same number that JIMENEZ-GUZEL provided to the FBI as one of his phone numbers during an October 8, 2024 interview. Law enforcement’s investigation has also revealed that the 7846 Phone Number was associated with JIMENEZ-GUZEL’s mother.

54. In Group Chat 1, JIMENEZ-GUZEL also sent a photograph of himself with a blurred face while holding a gun upright in his right hand as depicted below, as well as a video of himself doing pullups.



55. JIMENEZ-GUZEL later stated:

[i]khwa [brotherhood] also
Before we leave
We need to have a fake group gay [sic]
Group chat
Of a fake plan
Of fake dates we're leaving[.]

56. JIMENEZ-GUZEL later reiterated:

[w]e have to make a fake chat
And a fake plan
I'm serious
Kind of have to fool the authorities[.]

July 21, 2025: "13 men can cause so much damage[.] I can also help us make IEDS"

57. On or about July 21, 2025, CHS-1 sent a private message on Messaging Application 1 to JIMENEZ-GUZEL, asking “Akhi [my brother] we are fighting under the flag of D [Dawla] or something else? I know about shame [sic], is their D [Dawla] Jordan? Never heard about D [Dawla] in Jordan[.]” JIMENEZ-GUZEL responded by audio message, stating: “so north of Jordan is where all the m³¹ are . . . and like Southern Syria . . .”

³¹ Based on my training, experience, and knowledge of this investigation, I believe that “m” is a reference to “mujahideen,” which as previously stated, is an Arabic term that refers to individuals who engage in jihad.

58. On or about that date, Co-Conspirator 5, located in Finland, sent a link to a group chat on Messaging Application 2 that was named “A** ****” (“Group Chat 2”).

59. The same day, JIMENEZ-GUZEL and his co-conspirators then joined Group Chat 2, the name of which was subsequently changed to “P***** T****.”

60. In Group Chat 2, Co-Conspirator 4 explained that the planning should be in four stages, stating:

STAGE 1: Gradually bring the ikhwa [brothers] from the West to Egypt

STAGE 2: Bring the ikhwa in 2 or 3 convoys from Egypt to Sham

STAGE 3: Settle down in Sham

STAGE 4: Take action.

Take action could involve many things, media work, j1h4d [jihad], istishhad³²

Could involve just literal dawah³³ (in person)

What do you think ikhwa?

61. Thereafter, JIMENEZ-GUZEL and his co-conspirators discussed practicing shooting, and Co-Conspirator 6, located in the United Kingdom, stated: “[m]e and [JIMENEZ-GUZEL] can help with weapons training and I can also help with tactics as I have some experience with this” and later stated that they had to plan “actual training exercises.”

62. JIMENEZ-GUZEL, who was using the display name “A** h****,” agreed and said “[w]e need a meet up spot and then we go.” JIMENEZ-GUZEL also stated that his “expertise is physical fighting.”

³² Based on my training, experience, and knowledge of this investigation, I believe that “istishhad” is an Arabic term that means “martyrdom.”

³³ Based on my training, experience, and knowledge of this investigation, I believe that “dawah” is an Arabic term that refers to the practice of inviting or calling people to Islam.

63. Co-Conspirator 6 then stated: “[i]f anyone else here has any training in weapons or tactics then please speak up, otherwise me and [JIMENEZ-GUZEL] will take responsibility for this.” JIMENEZ-GUZEL stated: “Physical training too” and “I knkw [sic] how to train all of you.”

64. JIMENEZ-GUZEL later sent a video of himself engaging in physical training on a mat, a video of himself at a shooting range, and a picture of a sniper.

65. During the conversation, JIMENEZ-GUZEL also told his co-conspirators: “let’s focus on meet up spot first.” He then stated: “[w]e won’t have time to study[.]” “We’re going to meet up[.]” “And then jihad إن شاء الله [God willing].”

66. On or about that date, in Group Chat 2, JIMENEZ-GUZEL sent an audio message, stating, in relevant part:

I think we need to group up near Israel, like in Jordan or something, get acquired what we need and then do something, something that’s going to leave a mark in history. Something that’s gonna make them create a documentary on you on Netflix. Something that’s gonna make you have a Wikipedia page.

67. Co-Conspirator 6 stated that they “can’t abandon jihad just to wait for sham[.]” JIMENEZ-GUZEL responded:

Brk³⁴ [sic] my point is
 There alr [already] is jihad
 Jihad isn’t just establishment of a state
 That’s gonna take a while
 It’s about qisas³⁵ and putting FEAR into mushrikeen³⁶
 Which will cause other ikhwa [brothers] to do the same
 That’s how this grows[.]

³⁴ Based on my training, experience, and knowledge of this investigation, I believe that “brk” is likely a misspelling of the word “bro.”

³⁵ Based on my training, experience, and knowledge of this investigation, I believe that “qisas” is an Arabic term referring to retribution or “an eye for an eye.”

³⁶ Based on my training, experience, and knowledge of this investigation, I believe that “mushrikeen” is an Arabic term referring to those who commit shirk, which means associating partners with God in worship. Shirk can involve worshipping idols, deities, or other beings alongside or instead of Allah, or attributing divine powers to them.

68. JIMENEZ-GUZEL explained that “[r]ealistically 13 ppl [people] will not create a state[.]” Co-Conspirator 6 responded: “[d]ecent skeleton crew for an operation through[,] especially if we hit multiple targets at once[.]” JIMENEZ-GUZEL then stated: “13 men can cause so much damage[.] I can also help us make IEDS[.]”³⁷

July 22, 2025: “I can get us pew [firearms]; “I can get it trafficked into sham”

69. On or about July 22, 2025, in Group Chat 2, JIMENEZ-GUZEL sent names of cities where they could live, as well as pictures and maps of the cities.

70. JIMENEZ-GUZEL also stated, among other things: “I can also get us pew.”³⁸ JIMENEZ-GUZEL further stated:

I can get it trafficked into sham
 Sham is a full battleground
 U csnt [sic] go to sham unprepared and without plan
 Think of Turkey as the preparation
 Plus it’s easier to go to sham through Turkey
 Then from Jordan
 Jordan rn [right now] shut down its borders.

July 23, 2025: “Turkey is the easiest”

71. On or about July 23, 2025, JIMENEZ-GUZEL and his co-conspirators discussed splitting into groups. JIMENEZ-GUZEL proposed having two groups that would meet in sham.

72. JIMENEZ-GUZEL further stated, among other things, “[a]nd the Turkish border is the easiest” “Ppl [people] go from Turkey to Iraq all the time...And sham[.]” He reiterated: “Turkey is the easiest[.]” “Turkey borders both Iraq and sham[.]” Co-Conspirator 7, located in Florida, asked: “Isn’t turkey always searching for our group[.]” JIMENEZ-GUZEL responded: “They used to[.]”

³⁷ Based on my training, experience, and knowledge of this investigation, I believe that “IED” is an abbreviation for improvised explosive device which is typically a homemade bomb or explosive device.

³⁸ Based on my training, experience, and knowledge of this investigation, I believe that “pew” refers to a gun and is a variation of the slang term “pew pew” which is used to mimic the sound of a gun firing.

73. JIMENEZ-GUZEL also mentioned that three people in Group Chat 2, including himself, spoke Turkish “[a]nd can pass as locals” which would help them navigate. JIMENEZ-GUZEL explained that there were four cities in Turkey from which they could enter sham by getting smuggled and sent a picture of a map with markings.

74. JIMENEZ-GUZEL stated that it was “[w]ay too risky” to legally go through the border. He later stated: “I know a weapons smuggler[.] I’m gonna simply ask him to smuggle us.”

75. Among other things, JIMENEZ-GUZEL stated:

Im gonna film a day in the life

...

YouTube style

...

U have to realize

Media is very important

...

We have to show the world

That western Muslims

...

Are going to dar al jihad

It will motivate so many brother[sic]

Once ppl see ppl are going

They’ll go too[.]

76. JIMENEZ-GUZEL then explained: “[w]e need to hop on a call sometime and discuss when we go and which city ect [sic] [.] We can’t just brainstorm all the time[.] And we need plan A B and C just in case[.] Stuff happens[.]” JIMENEZ-GUZEL also stated that he would be talking to a guy about smuggling that day, and explained that

[t]here are the 4 bkrders [sic]

If u guys tell me where in Syria we wanna go

I’ll figure out the borders[.]

77. During a subsequent video call, the audio of which was recorded in part by UCE-1, the members discussed housing arrangements. JIMENEZ-GUZEL stated: “[a]lso, don’t get too comfortable in Turkey because let’s say we’re there for months, then one day, the guy says okay, we are ready to go. Like everyone has to be fully

locked/rocked in.. and we're mostly gonna be going very early in the morning or very late at night, we're not gonna go in the middle of the day."

July 24, 2025: "We're gonna go in groups"

78. On or about July 24, 2025, the name of Group Chat 2 was changed to: "W**** V****".

79. Co-Conspirator 3 described the plan as:

In max 6 months, we're gonna link in Diyarbakir. But first we need to take long-travel busses [sic] from whatever city we land in in [sic] Turkey, to Diyarbakir. We're gonna go in groups. Every group needs 1 Turkish-speaking person . . .

80. On or about that date, MIRREH joined Group Chat 2 after Co-Conspirator 3 added him to the group.

JIMENEZ-GUZEL, MIRREH, AND OTHER CO-CONSPIRATORS AGREE ON THEIR PLAN TO TRAVEL TO FIGHT FOR ISIS OVERSEAS

81. MIRREH, on or about July 24, 2025, stated that JIMENEZ-GUZEL spoke with him "and 2 other brothers." MIRREH later stated: ". . . I'm with u guys 100%[.]" "It's good[.]" MIRREH then declared: "I'm trynna [trying to] do vacation."³⁹

82. JIMENEZ-GUZEL told Group Chat 2, in relevant part:

. . . [MIRREH] said something which is true[.]
 Every single one of you . . .
 Here
 Has to give the mentality of a wolf
 Meaning
 Ur [You're] gonna put the wolf pack first
 Ur [You're] gonna sacrifice everything
 And will not fold under pressure
 This includes me and all of u [you]
 And thing [sic] to yourselves

³⁹ Based on my training, experience, and knowledge of this investigation, I believe that "vacation" is a commonly used term as a code word for jihad.

Is hijrah simply a dream to make ourselves feel better, or is it something we will truly want to do
I personally thing [sic] all of you are good ilhwa [sic]
And rlly [really] do want hijrah[.]

83. MIRREH responded: “[m]any brothers are all talk . . . And some brothers want to go just to live under them[.]”

84. MIRREH subsequently stated that he was speaking to the “ikhwa [brothers]” that he trusts and that the ikhwa said that they are “building a training ground for us . . . [a] hunting ground” in the west. MIRREH explained: “2 agreed[.] The other brothers said give them time[.] I told them 6 months[.]”

85. JIMENEZ-GUZEL responded:

Yeah we’re the first ones
To go
We’re basically the bait
We taking the risks
But it’s worth it[.]

86. Thereafter, in Group Chat 2, JIMENEZ-GUZEL sent a text of a hadith⁴⁰ that referred to jihad, which stated, in relevant part, that whoever “wages jihad” “has a right upon Allah Almighty that he will enter Paradise.” He also sent a photograph of himself, showing his face.

87. Co-Conspirator 6 later explained: “we’re planning the meet up first[.] But the meet-up is gonna be a meetup we don’t come back from akhi [my brother][.] So if we get a chance then we’ll go straight away[.]”

88. During a video call, the audio of which was recorded, JIMENEZ-GUZEL stated: “[t]his chat is only for hijrah. . . it’s a vacation [jihad] like you said[.]” In response to Co-Conspirator 6 telling him not to say hijrah, JIMENEZ-GUZEL stated: “I’m trying to use code words like you said to not flag... we’re not making vacation [jihad] just in Turkey, you know that, right? . . . Turkey is not the permanent vacation [jihad][.]”

⁴⁰ Based on my training, experience, and knowledge of this investigation, I believe a hadith is a record of traditions or sayings of the Prophet Muhammad. It is a collection of reports, which may include his words, actions, or tacit approvals, and is a major source of religious law and moral guidance in Islam.

89. JIMENEZ-GUZEL also stated that he used to live in New Jersey and would be meeting the other members in Istanbul.

90. JIMENEZ-GUZEL described the agreed-upon plan as follows:

In max 6 months, we're gonna link in Diyarbakir. But first we need to take long-travel busses [sic] from whatever city we land in in Turkey, to Diyarbakir. We're gonna go in groups. Every group needs 1 Turkish-speaking person.

91. JIMENEZ-GUZEL then described three groups: a group associated with Sweden, a group associated with the United Kingdom, and a group associated with the United States, including himself. He then described the travel plans for each group, and provided an estimated cost of travel per person.

July 25, 2025: "We are not operating an entire cell on our own, once we do hijrah we will be assigned to a commander"

92. On or about July 25, 2025, MIRREH sent a video, and stated: “[u]s all on vacation [jihad] inshallah [God willing] [Co-Conspirator 4] will record like he wishes.”

93. MIRREH later sent a video of a gun that appears to be on an individual’s lap while sitting in the driver’s seat of a car. The video also displayed other individuals in the passenger seat of the car.

94. Co-Conspirator 3 later asked the group members if they were “excited for the vacation [jihad],” sent an emoji of a green bird, and stated: “[l]ots of green birds.”⁴¹

95. JIMENEZ-GUZEL then stated: “I’m also gonna teach yall some grappling[.]⁴² And we’ll complete eacho[t]her[.] It will motivate u[.]

96. JIMENEZ-GUZEL told his co-conspirators that he spoke to multiple smugglers and that most of them travelled through Iraq but some tried sham. He

⁴¹ Based on my training, experience, and knowledge of this investigation, I believe green birds are frequently used as coded references to jihad. The souls of martyrs who die for the cause of Islam are said to reside within green birds, who are granted freedom to roam paradise.

⁴² Based on my training, experience, and knowledge of this investigation, I believe “grappling” is a fighting technique used in hand-to-hand combat.

stated: “[a]ll of the weapons[,] vehicles[,] technology[,] drones[,] are in diyarbakir[.] That’s the hub[.] U can buy anything u want it’s like a free black market[.]” JIMENEZ-GUZEL stated that they also “gotta learn how to make IEDS.”

97. Co-Conspirator 6 later said: “[w]e are not operating an entire cell on our own, once we do hijrah[,] we will be assigned to a commander.” Co-Conspirator 6 also said: “we will still operate by ourself. We’re not gonna delay jihad because [sic] we can’t find the emir.”⁴³

98. JIMENEZ-GUZEL asked his co-conspirators for a particular ISIS execution video. He stated, in relevant part: “Bro[,] I need the whole video[.] Can someone type what he says[.] I’m gonna do sum [sic] crazy stuff[.]”

99. Co-Conspirator 5 then sent the video, which showed beheadings committed by ISIS fighters.

100. MIRREH subsequently sent a photograph of a gun with a loaded extended magazine. He stated: “[a] whole extended mag with a switch.”

101. Co-Conspirator 5 sent a video showing footage of ISIS fighters and said: “[u]s [s]loon.” MIRREH responded to the video, stating “[t]he beginning is us.”

102. Co-Conspirator 5 subsequently stated: “[e]ach of us will kill many many kuffar [non-believers] and murtadeen⁴⁴ and free many Muslims before Allah takes our lives[.]”

103. JIMENEZ-GUZEL later sent a photograph of himself while wearing a Montclair High School uniform. He captioned the photograph: “[w]hen I played football[.]”

104. JIMENEZ-GUZEL, MIRREH, Co-Conspirator 4, and CHS-1 spoke on a live video call on Messaging Application 2. During the call, the audio of which was not recorded, MIRREH stated, among other things, that he initially planned on only assisting the group with finances, but changed his mind and wanted to travel for hijrah too.

⁴³ Based on my training, experience, and knowledge of this investigation, I believe that “emir” is a ruler, chief, or commander in Islamic countries.

⁴⁴ Based on my training, experience, and knowledge of this investigation, I believe that “murtadeen” is an Arabic term that refers to someone who has renounced their faith in Islam.

July 26, 2025: "I wanna die while benefitting the ikhwa [brotherhood]"

105. On or about July 26, 2025, JIMENEZ-GUZEL and his co-conspirators had a conversation about funding, during which JIMENEZ-GUZEL stated that he was getting more contacts in sham.

106. Co-Conspirator 6 also stated:

Bro . . . I had a dream a few months ago and it literally matches everything we're talking about and planning, I thought it was just random dream but I made the connection last night[.] Bro I saw my own death in this dream as we were fighting around one of the camps and rescuing sisters.

107. JIMENEZ-GUZEL responded: "we can all die that way . . . I wanna die while benefitting the ikhwa [brotherhood]."

108. MIRREH 1 stated that his role will be to handle "financial stuff" and that he will also be "a bookkeeper." He later reiterated in an audio message that he would be the bookkeeper who recorded all expenses in a notebook and mentioned the purchase of "toys."⁴⁵

109. Co-Conspirator 5 sent a video with images of green birds, representing jihad, and accompanying text. The member stated: "this will be us btw [by the way]..."

110. JIMENEZ-GUZEL later sent another video of himself showing his face.

111. MIRREH subsequently sent a video of a landscape and a picture of an individual hiking. MIRREH also sent audio messages, stating that he was on a hike and "[i]magine bullets and toys [handguns] . . . in the backpack. That would be much, much harder. . . next hike, Imma [I'm going to] put weights in my bag."

July 27, 2025: "We're not coming back bro! / we're going to die there inshallah"

112. On or about July 27, 2025, in Group Chat 2, JIMENEZ-GUZEL stated:

Announcement!

⁴⁵ Based on my training, experience, and knowledge of this investigation, I believe that "toys" is a reference to handguns.

For now until the winter, don't mention sus⁴⁶ stop [sic] anywhere on any app as all of it can be traced back to you guys. Don't search for any apartments in Diyarbakir as they can see ur [your] search history. We alr[eady] have planned how we go there, we'll figure out the housing once we're there and the over all [sic] plan[.]

Don't use words that will trigger counter terrroisks [sic] ikhwa [brotherhood][.]

113. MIRREH responded: "Yea wallah we shouldn't talk hot[.]" In response to a question from CHS-1, MIRREH stated that he was located in Washington.

114. JIMENEZ-GUZEL later reiterated:

And don't say anything sus [suspicious] in any other app

...

They're all traceable

And make sure u [you] guys stick together[.]

115. JIMENEZ-GUZEL then instructed his co-conspirators not to search for apartments, and to buy plane tickets that did not have Istanbul as the final destination.

116. In response to CHS-1 asking how long they would stay in Turkey, JIMENEZ-GUZEL stated:

[w]e plan all that when we go there Akhi [my brother] . . .

We could say this many months now

But what if by December

The doors of jihad are fully open[.]

117. JIMENEZ-GUZEL's co-conspirators also shared ISIS propaganda videos. For example, MIRREH sent a video about hijrah that included images of ISIS fighters and the ISIS flag. He stated: "[l]isten to this ikwa [sic] [brothers] [rose emoji][.]"⁴⁷ The video was narrated in English by an unknown speaker who described

⁴⁶ Based on my training, experience, and knowledge of this investigation, I believe that "sus" is an abbreviation of "suspicious."

⁴⁷ Based on my training, experience, and knowledge of this investigation, I believe red roses have been used by ISIS to symbolize martyrdom in its actions.

hijrah as asking someone to jump off a cliff while not allowing them to look down at the bottom to see if there were water or rocks.

118. CHS-1, JIMENEZ-GUZEL, MIRREH, and other co-conspirators later participated in a video call. During the call, JIMENEZ-GUZEL, who showed his face, stated, among other things, “[w]e’re not coming back, bro[.] we’re going to die there inshallah [God willing].”

119. MIRREH responded: “yeah, inshallah [God willing].” He later stated that a documentary would probably be made about the group, and that he was planning on leaving his flag⁴⁸ and books in his room for others to find.

120. JIMENEZ-GUZEL also discussed having a plan that would result in him having a Wikipedia page and a documentary. JIMENEZ-GUZEL also stated that he would be the top most 100 evil people in the world, and that his plan was so detailed and included drones.

121. Among other things, JIMENEZ-GUZEL and his co-conspirators discussed videos of beheadings.

122. At one point, JIMENEZ-GUZEL asked others who would be giving a speech with “the mask.” JIMENEZ-GUZEL stated that they could cut a lamb, and that he could do this in one slash.

123. MIRREH discussed speeches and said that he would be the one giving the speeches for the group. MIRREH said that he would be the “emir”; he then corrected himself and stated: “the imam.”

124. JIMENEZ-GUZEL thereafter referenced a video in which someone was seen slicing a woman’s throat. He later stated: “we also need to know who is doing the, you know....” JIMENEZ-GUZEL thereafter made a motion with his hand, that appeared to be a slicing of the throat motion, while making a clicking noise with his mouth. MIRREH responded that all of the members had to do this [slicing of an individual’s throat]. JIMENEZ-GUZEL disagreed and said that all of the members did not have to do this, and stated, “I’ll do it bro.”

125. Thereafter, MIRREH described how some gangs in America required members to “unalive” someone as part of the initiation process and explained that

⁴⁸ Based on my training, experience, and knowledge of the investigation, I believe MIRREH was likely referring to the ISIS flag.

this was done so that members did not fear “unaliving” a person. MIRREH then stated: “[a]ll of us is gonna have to unalive one person to get that mentality and to get into our brain that we unalive someone and once we come, we don’t hesitate no more.” JIMENEZ-GUZEL responded: “[b]ro, it’ll be easy for me.” MIRREH stated: “[i]t’ll be easy for me bro. It’s just I know one of us is gonna throw up.” JIMENEZ-GUZEL responded by laughing.

126. MIRREH, JIMENEZ-GUZEL, and Co-Conspirator 4 then discussed guns and explosives. MIRREH expressed that he wanted a gun with attachments and that he was willing to pay extra for them. JIMENEZ-GUZEL responded, “they just bring you a gun . . . some will have attachments, some won’t have attachments.”

127. JIMENEZ-GUZEL then stated that they would likely be able to obtain RPGs,⁴⁹ but not missiles. MIRREH stated that they could make one and that he had knowledge of making a trigger weapon. JIMENEZ-GUZEL responded that he was “pretty sure” that they could obtain explosive vests and “grenades, for sure, 100%.”

July 28, 2025: “We will go to Istanbul by plane...”

128. Thereafter, on or about July 28, 2025, in Group Chat 2, MIRREH sent an image of an individual, whose face was covered by a mask but whom I believe is MIRREH, wearing a black ISIS hat and raising his left index finger.⁵⁰

129. MIRREH also sent a photograph of the cover of a manual published by the United States Department of the Army entitled “Soldier’s Manual of Common Tasks: Warrior Skills Level 1.” The manual provided detailed instructions regarding warrior skills for soldiers.

130. JIMENEZ-GUZEL later discussed outfits to wear in the airport and sent two photographs of himself with a blurred face.

131. In response to a potential leak of information, JIMENEZ-GUZEL stated: “[i]f the madkhali⁵¹ knkw [sic] this plan it’s cooked[.] Straight police[.]” He also sent two videos of himself with a bloodied nose.

⁴⁹ Based on my training, experience, and knowledge of this investigation, I believe that “RPG” refers to a rocket-propelled grenade.

⁵⁰ As indicated above, based on my training, experience, and knowledge of this investigation, I believe that this is a gesture often used in ISIS propaganda.

⁵¹ Based on my training, experience, and knowledge of this investigation, I believe Madkhali is a strain of Salafism, a fundamentalist Islamic movement.

132. Because of potential leaks of information from Group Chat 2, JIMENEZ-GUZEL created a separate group chat on Messaging Application 2 for members who were part of the group that was based in the United States. It was named “U** G****” (“Group Chat 3”). The members of Group Chat 3 included, but were not limited to, JIMENEZ-GUZEL, MIRREH, CHS-1, UCE-1, and other co-conspirators.

133. Among other things, in Group Chat 3, JIMENEZ-GUZEL explained that there must be changes to the group’s plan because the Turkish border had been militarized, which made it “nearly impossible to go to sham.”

134. JIMENEZ-GUZEL stated:

1. We will go to Istanbul by plane and then from there to Erbil which is Iraqi Kurdistan; it’s the same culture as diyarbakir just in Iraq[.]
2. [Co-Conspirator 5] will be meeting us there already so we won’t worry about housing, food or other necessities[.]
3. Everything else is the same[.] We’ll be meeting up in Nj and go to Istanbul together[.] I haven’t decided if we should get 1 way or 2 way[.] But 2 way is safer but more expensive[.]
4. Make sure you look like ur [you’re] a kafir[.]⁵²
5. The excuse you’ll be making is to go to [Co-Conspirator 5’s] wedding which he will most likely actually have
6. Everything else is the same[.]

135. JIMENEZ-GUZEL also stated:

Everyone needs to read this[.]
We should be leaving around December/ January[.]
Our group is hardest[.]
Cuz grou[p] 1 and 2 go straight to Erbil[.]

⁵² Based on my training, experience, and knowledge of this investigation, I believe that “kafir” is an Arabic term that means “disbeliever” or “non-believer.”

We need to make a pit stop
In Istanbul[.]

July 29, 2025: MIRREH participates in call where Co-Conspirator 4 states he wants to make JIMENEZ-GUZEL the new Jihadi John

136. On or about July 29, 2025, MIRREH, Co-Conspirator 4, and UCE-1 held a video call; JIMENEZ-GUZEL was not on the call.

137. According to UCE-1, during the call, Co-Conspirator 4 mentioned that he wanted to make JIMENEZ-GUZEL the new “JJ” (Jihadi John), a British militant who appeared in several videos produced by ISIS showing the beheadings of captives in 2014 and 2015. Co-Conspirator 4 also mentioned that he wanted to make a video of the Israeli flag burning while holding an ISIS flag.

138. In Group Chat 2, MIRREH shared a news bulletin regarding ISIS, and a video of men with rifles dancing in front of an ISIS flag, captioned, “[t]he night of brother @a wedding inshallah [God willing].”

July 30-31, 2025: JIMENEZ-GUZEL creates a new group chat for U.S.-based co-conspirators

139. On or about July 30, 2025, and July 31, 2025, CHS-1 exchanged private messages with JIMENEZ-GUZEL in which JIMENEZ-GUZEL stated that he was going to create a new group chat. JIMENEZ-GUZEL also told CHS-1 to leave Group Chat 3. JIMENEZ-GUZEL explained that the group was still up for vacation [jihad] but said that he was not going to create a new group chat yet.

140. On or about July 31, 2025, JIMENEZ-GUZEL created a new separate group chat on Messaging Application 2 for members who were part of the group that was based in the United States. It was named “G**** U**” (“Group Chat 4”).

August 1, 2025: JIMENEZ-GUZEL provides updated travel plan to the U.S.-based co-conspirators

141. On or about August 1, 2025, in Group Chat 4, JIMENEZ-GUZEL set forth an updated plan and instructed the members of Group Chat 4 to not respond and “[j]ust like the message if u [you] understand.”

142. JIMENEZ-GUZEL stated that MIRREH and Co-Conspirator 6 were “going first, start of October through Dubai to check how the way etc[.] is.” JIMENEZ-GUZEL then stated:

If the way is open we just go to Dubai as well if not we go turkey Diyarbakir. And we're gonna arrive in Dubai latest 15 December. Some ikhwa [brothers] are gonna come a bit earlier. And as I said, this is if we see [Co-Conspirator 6] and MIRREH go in safely[.]

... Some ikhwa [brothers] are gonna come a bit earlier. And as I said, this is if we see [Co-Conspirator 6] and MIRREH go in safely[.]

Whoever has read it and understood it leave the gc [group chat], I'll message u [you] guys in around October and write either 'DU' or 'DI'. DU means Dubai is good to go. DI means we're gonna go Diyarbakir instead[.]

U [You] go from Dubai straight to Damascus and we have contacts ther [sic]

It's easiest for now

This plan can change so if it does [Co-Conspirator 3] will text all of us

DI

If u [you] guys understand . . .

Lmk [let me know]

When it's close to the date

We'll plan how to come but [MIRREH] will go sooner . . .

143. On or about that date, JIMENEZ-GUZEL and CHS-1 messaged each other on Messaging Application 1. JIMENEZ-GUZEL stated, among other things, that UCE-1 would text “[t]he whole plan” to CHS-1, and that they plan on leaving “December 10-15[.]”

August 2 and August 5, 2025: “You allow us to enter Jannah, or you submit to us in dunya”

144. On or about August 2, 2025, on Messaging Application 2, MIRREH and CHS-1 exchanged messages and spoke to each other in a live call. During the recorded

call, MIRREH updated CHS-1 on the aforementioned plans, and stated that he was preparing himself physically, mentally, and spiritually. Among other things, MIRREH stated that he would be bringing a drone and would tell airport personnel that he landscaped and flew the drones for his videos. MIRREH also stated that he would be bringing two phones with him and would claim that he was using one of the phones for streaming.

145. On or about August 5, 2025, JIMENEZ-GUZEL and UCE-1 exchanged messages on Messaging Application 1. UCE-1 expressed dismay about not being part of the group chat, and JIMENEZ-GUZEL responded in a recorded audio message, stating, among other things:

Akhi [my brother] it's not personal. We didn't add anyone else. It's not like . . . you did something. It's because, one, we're already going with a big group of people and akhi [my brother] like this is not . . . 2014 anymore, right? The feds are way more active and the feds are way more alert. What's gonna happen is once I go . . . then everyone's gonna start coming from around the world. We're basically like the mujahideen [jihad fighters] and then the ansar⁵³ are already there and then theres gonna be more mujahideen [jihad fighters] there inshallah [God willing].

Don't take it personally akhi [my brother]. You're just gonna need to wait a bit longer than me because you're going late. Just prepare yourself. It's not personal. It's because there's a lot of spies . . . So don't take it personally.

146. On or about that same date, on Social Media Platform 1, JIMENEZ-GUZEL posted an image of a man whose face was concealed by an emoji of a black flag with a red background. The man was wearing a shoulder holster and raising his left index finger.⁵⁴ The text accompanying the image stated:

[w]hen will kuffar [non-believers]
understand they cannot
win

⁵³ Based on my training, experience, and knowledge of this investigation, I believe that “ansar” is an Arabic word that means “helpers” or “supporters.”

⁵⁴ As previously mentioned, based on my training, experience, and knowledge of this investigation, I believe that this is a gesture often used in ISIS propaganda.

You allow us to enter
Jannah [Heaven], or you submit to
us in dunya⁵⁵

YOU NEVER WIN[.]

August 7 and August 12, 2025: “I swore an oath”

147. On or about August 7, 2025, on Social Media Platform 1, JIMENEZ-GUZEL shared a screenshot of an image associated with “p*****,” a group on Social Media Platform 2 and Messaging Application 1 that collected donations for sisters in the Al Hol camp, which was associated with ISIS.⁵⁶

148. On or about August 12, 2025, on Social Media Platform 1, UCE-2 asked JIMENEZ-GUZEL how much money he should bring and what items he should bring. JIMENEZ-GUZEL responded by sending a recorded audio message, stating:

Akhi [brother] just save up. . . I can’t say much for now . . . you know, okay? I just can’t. I swore an oath [to ISIS]. I’m not gonna say anything for now. So just save up money akhi [brother] don’t worry. I’m not letting you go. I’m not forsaking you. Save up money akhi [brother] and keep working out and study Islam. Keep doing this inshallah [God willing].

August 15, August 20, August 27-28, and August 30, 2025: “we love death just how u love life”

149. On or about August 15, 2025, on Social Media Platform 1, JIMENEZ-GUZEL posted an image of the altered cover page of a book called: *Fiqh of Jihad: Understanding the Obligation* by Abdullah Ash-Shaybani. In particular, the image

⁵⁵ Based on my training, experience, and knowledge of this investigation, I believe that “dunya” is an Arabic word meaning “the world” or “this life.”

⁵⁶ Based on my training, experience, and knowledge of this investigation, I believe that the Al Hol camp is a fenced-in camp in Syria that was created for refugees; however, in 2019, individuals who were living under the rule of ISIS moved there. It is therefore associated with ISIS.

⁵⁷ Based on my training, experience, and knowledge of this investigation, I believe that “Fiqh of Jihad” refers to the Islamic jurisprudence (fiqh) governing the concept of jihad.

included a white box that concealed the text “ihad” and text, stating: “Great book regarding J [jihad]”

150. The redacted image is below:



151. On or about August 20, 2025, JIMENEZ-GUZEL returned to the United States.

152. On or about August 27, 2025 to August 28, 2025, MIRREH and CHS-1 sent each other messages on Messaging Application 2. During the conversation, CHS-1 asked MIRREH if he was “still up for vacation [jihad] [.].” MIRREH responded: “Yeah ofc [of course] akhi [brother]. Between early November to mid November[.]”

153. On or about August 30, 2025, on Social Media Platform 1, MIRREH posted an image of himself with a blurred face. The accompanying text on the image references jihad and provides: “They label us ‘qitals’⁵⁸ na’am⁵⁹ we are qitalis⁶⁰ because we are honored through ji’had fisabillah⁶¹ we love death just how u [you] love life[.]”

⁵⁸ Based on my training, experience, and knowledge of this investigation, I believe that “qital” is an Arabic term that refers to physical, military, or violent combat.

⁵⁹ Based on my training, experience, and knowledge of this investigation, I believe that “na’am” is an Arabic term that means “yes.”

⁶⁰ Based on my training, experience, and knowledge of this investigation, I believe that “qitali” likely refers to an individual who engages in “qital.”

⁶¹ Based on my training, experience, and knowledge of this investigation, I believe that “ji’had fisabillah” refers to “jihad fisabilillah” which is an Arabic phrase meaning “striving or fighting in the path of Allah.”

154. The redacted image is below:



September 1, 2025: JIMENEZ-GUZEL confirms the plan to travel to sham by way of Turkey

155. On or about September 1, 2025, JIMENEZ-GUZEL, MIRREH, UCE-1, and CHS-1 were in a group chat on Messaging Application 2 called “C*****L*****” (“Group Chat 5”).

156. JIMENEZ-GUZEL, UCE-1, and CHS-1 participated in a recorded audio call in Group Chat 5. During the call, among other things, JIMENEZ-GUZEL stated that he was back in the United States and that there were “many plans” that “keeping changing,” and that the main plan was to go to Turkey and then go to sham.

September 10, 2025: “we’re all booking our round trips for two weeks right...obviously, the kuffar [non-believers] and stuff like that will expect us to come back on that round trip”

157. On or about September 10, 2025, during a recorded audio call on Messaging Application 2, MIRREH told CHS-1 that they would start booking tickets “next month” and that the plan was for everyone to leave on Sunday, November 16th. MIRREH also explained that the group would travel from Turkey to Iraq, and that once they were in Iraq, they would figure out how to get to Deir ez-Zor, which is a governorate in Syria.

158. MIRREH further explained: “we’re all booking our round trips for two weeks, right. Obviously, obviously, the kuffars [non-believers] and stuff like that will

expect us to come back on that round trip." He also stated that he had "already made an oath [to ISIS]."

159. CHS-1 told MIRREH about Group Chat 5 and cautioned him to be careful with what he said. MIRREH responded: "I'm probably not gonna say anything hot. PG-13 when the time comes 'cause uh . . . it just gets too much eyes on when someone's talking hot, you know?"

160. According to MIRREH, Co-Conspirator 4 purchased media equipment for the group including a camera, mics, and a laptop. After the call, CHS-1 sent MIRREH a link to join Group Chat 5, and MIRREH joined Group Chat 5.

September 11 - 12, 2025: "We should be leaving between November 10-18"

161. On or about September 11, 2025, in Group Chat 5, JIMENEZ-GUZEL sent CHS-1, UCE-1, and MIRREH a reminder, stating:

[i]khwa [brothers] reminder
As the America group
We should be leaving between November 10-18

That week
Well buy the tickets next month[.]

MIRREH responded: "Inshallah [God willing]."

162. On or about September 12, 2025, MIRREH and CHS-1 messaged each other on Messaging Application 2. During the conversation, MIRREH acknowledged that he had taken an oath, likely referring to an oath to ISIS, but would not provide details on how he did it, replying "[t]oo hot[.]"

September 15 – 16, 2025: JIMENEZ-GUZEL suggests that MIRREH and other co-conspirators deactivate their social media accounts "before vacation"

163. On or about September 15, 2025, JIMENEZ-GUZEL created a new group chat on Messaging Application 2 called "L**** C*** a*** r*****" ("Group Chat 6").

164. On or about that date, in Group Chat 6, JIMENEZ-GUZEL told MIRREH, CHS-1, UCE-1, and other co-conspirators:

After reading this[,] leave the chat[.]

Barakallahu feek⁶²

Deactivate all ur [your] socials [social media accounts] 2-3 weeks before vacation [jihad]

Very vital step in this ikwa [brothers]

May [Allah] bless u [you] all[.]

165. On or about September 16, 2025, JIMENEZ-GUZEL and UCE-2 sent each other messages on Messaging Application 2. During the conversation, JIMENEZ-GUZEL asked UCE-2 to ask another individual a question about jihad on his behalf. JIMENEZ-GUZEL described the question as:

this is a . . . question regarding defensive jihad

So as far as I know there's no conditions for defensive jihad

But there's conditions for khuruj⁶³

So my question is let's say the enemy forces fully occupy or conquer a Muslim land, would that still be considered defensive jihad or would it be considered they rule over so it's khuruj. Because one of the conditions of khuruj is ability[.]

September 18, 2025: "So everyone has to go to the Dawla"

166. On or about September 18, 2025, JIMENEZ-GUZEL and UCE-2 messaged each other on Messaging Application 2. During the conversation, UCE-2 asked JIMENEZ-GUZEL whether "the final destination of the hijrah" is "joining up with the ikhwa [brothers] in Sham[.]"

⁶² Based on my training, experience, and knowledge of this investigation, I believe that this is an Arabic phrase that translates to "may Allah bless you."

⁶³ Based on my training, experience, and knowledge of this investigation, I believe that "khuruj" is an Arabic term that has two meanings in Islam. One refers to missionary journeys to spread Islamic teachings and revive spiritual practice. The other refers to armed rebellion or an organized movement to remove a ruler from power.

167. JIMENEZ-GUZEL responded: “Ofc [of course.]” He then stated:

Hijrah itself is fard al ayn [sic]⁶⁴
If I make hijrah to Dubai
That's not human [sic]
Hijrah[.]

UCE-1 responded: “Yeah that's dar al kufr [sic]⁶⁵ honestly.” JIMENEZ-GUZEL stated “Ofc [of course]” and that everyone who can do hijrah has to do it.

168. JIMENEZ-GUZEL then confirmed to UCE-2 that he did not need the permission of his parents to do hijrah because they were doing defensive jihad. JIMENEZ-GUZEL later stated:

The only part I was worried
Was if we're in defensive or offensive
But it's 100% defensive
Palestine is being slaughtered
Thousands of sisters in prisons
It's 100% fard al ayn
Hijrah is separate
That's always fard al ayn
So everyone has to go to the Dawla⁶⁶
But as for fighting
Depends if it's individual or collective obligation
But as we know it was defensive[.]

September 21, 2025: MIRREH confirms he is ready for “vacation”

⁶⁴ Based on my training, experience, and knowledge of this investigation, I believe that “Fard ‘ayn” is a term that refers to religious obligations that are binding on each individual Muslim.

⁶⁵ Based on my training, experience, and knowledge of this investigation, I believe that “Dar al-kufr” is an Arabic term that refers to a land where non-Muslim laws and beliefs are dominant.

⁶⁶ As indicated above, based on my training, experience, and knowledge of this investigation, I believe that “dawla” is an Arabic word that refers to state or government and commonly refers to ISIS.

169. On or about September 21, 2025, JIMENEZ-GUZEL and UCE-2 messaged each other on Messaging Application 2. During that conversation, UCE-2 asked JIMENEZ-GUZEL for a route that he could take for hijrah. JIMENEZ-GUZEL replied: “Akhi [brother][,] i [sic] genuinely can’t say. But you can imagine what it is[.]” He re-assured UCE-1 that he would handle the route for him, and stated: “If I didn’t make [an] oath [to ISIS,] I would have told u [you].” JIMENEZ-GUZEL told UCE-2 to be patient and that he should be ready by December.

170. Later that day, JIMENEZ-GUZEL, MIRREH, UCE-1, and CHS-1 had a conversation in Group Chat 5. JIMENEZ-GUZEL instructed them to download a messaging application (“Messaging Application 3”).⁶⁷ UCE-1 stated that he was “getting ready for vacation [jihad],” and MIRREH responded: “[w]e all are” and sent an emoji of crossed fingers. Both MIRREH and UCE-1 then sent their Messaging Application 3 account ids. JIMENEZ-GUZEL told them: “[t]his app can’t be traced alhamdulilah [praise be to God].”

171. Thereafter, on Messaging Application 3, JIMENEZ-GUZEL invited MIRREH, UCE-1, and CHS-1 to join a group chat called “C***** M***” (“Group Chat 7”). In Group Chat 7, JIMENEZ-GUZEL sent a photograph of a September 18, 2025 online article from *Foreign Affairs*, entitled “The Return of ISIS: The Group Is Rebuilding in Syria—Just as U.S. Forces Prepare to Leave.”

September 22, 2025: “[W]e’re gonna get tazkiyah...and that’s how we’re gonna...actually meet the actual ikhwa, inshallah, in the final destination”

172. On or about September 22, 2025, on a messaging application (“Messaging Application 4”),⁶⁸ JIMENEZ-GUZEL initiated a call with CHS-1 and UCE-1. Among other things, JIMENEZ-GUZEL said that someone was going to “fund the group,” and “we are all going separately to Thanksgiving land.”⁶⁹ JIMENEZ-GUZEL explained that everyone was traveling from their local airports because “it is the safest way” and they would all be traveling on November 16th to Istanbul Airport.

⁶⁷ Messaging Application 3 is an end-to-end encrypted messaging and telephone application. It can be installed on cellular telephones, desktop computers, or tablets.

⁶⁸ Messaging Application 4 is an end-to-end encrypted messaging and telephone application. It can be installed on cellular telephones, desktop computers, or tablets, and synced across multiple devices.

⁶⁹ Based on my training, experience, and knowledge of the investigation, I believe that “Thanksgiving land” is a reference to Turkey.

173. JIMENEZ-GUZEL also explained that they would stay overnight at a hotel, and “we’re gonna get tazkiyah⁷⁰, inshallah [God willing], actual tazkiyah [God willing] from the Jamaah⁷¹. . . and that’s how we’re gonna . . . actually meet the actual ikhwa, inshallah [God willing], in the final destination.”

174. JIMENEZ-GUZEL then started a separate call on Messaging Application 4 with CHS-1, UCE-1, and Co-Conspirator 4. Among other things, JIMENEZ-GUZEL stated that there was a group of individuals in a particular city in Turkey who were “being taken care of by the ikhwa [brothers] under the Jamaah.” According to JIMENEZ-GUZEL, those individuals would give the group “tazkiyah” and the group would pick up their money from there. After getting “tazkiyah,” they would get smuggled to the border and go to Deir ez-Zor.

175. JIMENEZ-GUZEL discussed travel and explained that there was going to be another call on or around October 15, 2025 in which everyone would purchase tickets for November 16, 2025, at the same time for the same airline to the Istanbul Airport. He also explained that the tickets would be cheaper, and it was less “sus [suspicious]” to buy the round-trip tickets ahead of time. JIMENEZ-GUZEL also reiterated that all of the group’s messages should be deleted, including photos that were “sus [suspicious],” and that JIMENEZ-GUZEL’s name should be changed in their phones “to a white name.”

176. JIMENEZ-GUZEL also suggested that they “learn how to disarm a pew pew [gun],” and mentioned that there were videos online on how to “open it and clean it[.]”

177. Thereafter, JIMENEZ-GUZEL started a separate call on Messaging Application 2 with CHS-1, UCE-1, Co-Conspirator 4, and MIRREH. JIMENEZ-GUZEL then left the call to pray, and the others updated MIRREH on the plans to purchase the tickets. During parts of the call, Co-Conspirator 4 watched ISIS-related videos including images of individuals who had been killed.

178. MIRREH stated that they would have “tour guides . . . major tour guides for the Jamaah [ISIS], you know?” who would be welcoming them. Co-Conspirator 4

⁷⁰ Based on my training, experience, and knowledge of this investigation, I believe that “tazkiyah” is an endorsement of an individual by a member of a terrorist group. It is a letter of recommendation signed by an existing member of the group that vouches for the trustworthiness of another individual.

⁷¹ Based on my training, experience, and knowledge of this investigation, I believe that “Jamaah” is a reference to the Arabic word “jama’ah” or “jama’ah” which refers to congregation or community, and is likely a reference to ISIS in this context.

then explained that they would do “tazkiyah” and then cross the border, and that Co-Conspirator 4 has asked Allah to “make h [hijrah] easy,” and “make J [jihad] easy.” Co-Conspirator 4 also stated that a financial donor would be providing them with money.

179. After JIMENEZ-GUZEL re-joined the call, MIRREH referred to himself as a “mujahid [jihad fighter].” JIMENEZ-GUZEL later reminded MIRREH not to “tell anybody about the plan.”

MIRREH DISCUSSES HIS EFFORTS TO FINANCE THE CONSPIRATORS
PLANNED TRAVEL WITH JIMENEZ-GUZEL AND THE OTHER CO-CONSPIRATORS

180. In many of the aforementioned calls, MIRREH has referred to himself as the “finance guy” for the other co-conspirators who are traveling, and he has said that he could coordinate finances for their trip. MIRREH has also set up accounts at Bank-2 on behalf of others in a fraudulent scheme with “Bob,” a Sweden-based individual to fund their trip overseas.

181. MIRREH also talked with the other co-conspirators about working with someone referred to as “brother Bob” who purchases usernames and passwords off the “dark web” and uses them in internet scams. MIRREH said “Bob” has given him half the proceeds from his scams to be used for the benefit of the group and their hijrah. MIRREH also stated that he intended to help by making an introduction of Co-Conspirator 3 to Bob, in an effort to raise money for their planned hijrah. MIRREH said that Bob is from Nigeria and at one point showed the group a picture of a check from Bob with MIRREH’s name on it.

182. MIRREH provided additional details on the financial operation with, “Bob.” MIRREH said, “It’s 500 dollar for a bank log off the market which he will buy and obviously you would not sent it to me you would send it to brother usama in Bitcoin.” MIRREH explained that one could then use the bank info to take money out of the account, but warned that if one attempted to take out multiple withdrawals, the whole account might be shut down.

183. MIRREH also stated that the group could send money to Bob using Bitcoin, a cryptocurrency, or through CashApp. MIRREH said that he had a CashApp account that was linked to his bank account and reported that he had received several

thousand dollars from this scheme. At one point, MIRREH also indicated that he should be receiving a check in the mail because Bob had bought another bank login.

184. Further, MIRREH told the other co-conspirators that he has a bank account with Bank-3 and recommended using low security credit unions like Bank-2. MIRREH reported that he also had a Bank-2 account, and that he had been withdrawing and depositing small amounts of money to “[w]arm up the account.” MIRREH indicated that a Bank-2 account was needed to cash out the proceeds from Bob. MIRREH indicated that he planned to go to the bank and request a loan before he leaves.

185. On or about July 25, 2025, JIMENEZ-GUZEL was observed on a live Messaging Application 2 call with MIRREH, and Co-Conspirator 4. During the call, JIMENEZ-GUZEL asked MIRREH to wire him some to get a “Money Flow” started. JIMENEZ-GUZEL also asked Co-Conspirator 4 to make stories about the journey to motivate others to come.

JIMENEZ-GUZEL, MIRREH, AND OTHER CO-CONSPIRATORS BOOK
THEIR TRAVEL TO TURKEY, ACTING ON THEIR AGREEMENT TO
REACH ISIS TERRITORY

186. On or about September 22, 2025, MIRREH researched air travel from Seattle to Istanbul, Turkey departing November 16, 2025.

187. On or about October 26, 2025, JIMENEZ-GUZEL was observed by law enforcement entering Bank-1 in Montclair, New Jersey. The investigation has revealed that at that time, he made a cash deposit of approximately \$1,200.

188. On or about October 27, 2025, MIRREH and JIMENEZ-GUZEL had numerous audio calls on Messaging Application 4 based on PRTT records. During one of the calls, MIRREH downloaded the Turkish Airlines application on his phone.

189. On or about that date, JIMENEZ-GUZEL purchased a round-trip ticket from Newark Liberty Airport in Newark, New Jersey to Istanbul Airport in Istanbul, Turkey scheduled to depart on or about November 17, 2025.

190. On or about that date at approximately 2:11 EDT, JIMENEZ-GUZEL started a video group call on Messaging Application 4 with MIRREH, Co-Conspirator 4, and Co-Conspirator 6 that lasted approximately 22 minutes. Based on other information known to me from this investigation, I believe that JIMENEZ-GUZEL was on this call during the time he bought his ticket.

191. On or about October 28, 2025, JIMENEZ-GUZEL reported to another FBI CHS (“CHS-2”)⁷² on Messaging Application 2 whom JIMENEZ-GUZEL believed to be an advisor on Arabic-related matters, that he had purchased his ticket to Turkey.

192. On or about that date, through the Turkish Airlines application, MIRREH purchased a round-trip ticket from Seattle-Tacoma International Airport to Istanbul Airport in Istanbul, Turkey scheduled to depart on or about November 16, 2025.

193. On or about November 1, 2025, on Messaging Application 2, JIMENEZ-GUZEL told CHS-2, in sum and substance, that this was the last time that he would be seeing his family, as he would be leaving on or about November 17, 2025. JIMENEZ-GUZEL further told CHS-2, in sum and substance, that there were approximately eight travelers, including himself. CHS-2 represented that there would be a vehicle to provide transportation into sham. JIMENEZ-GUZEL told CHS-2 that he was willing to pay approximately \$6,000 and then invited MIRREH to the call. MIRREH then invited Co-Conspirator 3 to the call.

194. Later, on or about November 1, 2025, on Messaging Application 2, JIMENEZ-GUZEL told CHS-2, in sum and substance, that he would be meeting with the ikhwa, and that under Jama’ah,⁷³ they would be doing bayat.⁷⁴

195. In a subsequent call on Messaging Application 2, on or about November 1, 2025, involving JIMENEZ-GUZEL, Co-Conspirator 3, and Co-Conspirator 4, JIMENEZ-GUZEL told CHS-2 that the group had approximately \$13,000 and that an individual was supposed to be providing more money. The group also discussed travelling from Turkey into sham.

196. I am also aware that in or around October 2025, one of JIMENEZ-GUZEL and MIRREH’s co-conspirators, Co-Conspirator 6, also booked an airline

⁷² CHS-2 is cooperating with law enforcement and is a validated and vetted source. CHS-2 has been a reliable source of information since in or around 2017.

⁷³ Based on my training, experience, and knowledge of the investigation, I believe that “Jama’ah” is a reference to the Arabic phrase “collective community or group of Muslims.”

⁷⁴ Based on my training, experience, and knowledge of this investigation, I believe that “Beyat” is a reference to the Arabic word “bayat.” In this context, “bayat” is an oath of loyalty or allegiance to ISIS.

ticket for travel from the United Kingdom to Istanbul, Turkey on or about November 17, 2025.

197. Further, the investigation has revealed that Co-Conspirator 4 also booked an airline ticket in or around October 2025 for travel from the United Kingdom to Istanbul, Turkey on or about November 17, 2025.

**JIMENEZ-GUZEL, MIRREH, AND OTHER CO-CONSPIRATORS
ACCELERATE THEIR TRAVEL PLANS AFTER THE ARRESTS OF THEIR
ASSOCIATES IN DEARBORN, MICHIGAN ON TERRORISM CHARGES**

198. As indicated above, other individuals in Dearborn, Michigan with whom JIMENEZ-GUZEL and MIRREH had been communicating were arrested on October 31, 2025, and charged with offenses related to those individuals' plot to carry out an armed attack on behalf of ISIS.

199. On or about November 2, 2025, the New Jersey-based individual who had communicated with JIMENEZ-GUZEL since 2024 regarding their shared intent to travel abroad in order to engage in violent jihad, Co-Conspirator 1,⁷⁵ met with UCE-1 and they discussed the recent arrests of the individuals in Dearborn and JIMENEZ-GUZEL's travel plans.

200. Co-Conspirator 1 told UCE-1 that he had met JIMENEZ-GUZEL approximately two years ago, and that JIMENEZ-GUZEL was from Co-Conspirator

⁷⁵ I am aware of additional information regarding CO-CONSPIRATOR 1's support for violent jihad and his desire to travel to ISIS territory abroad. For example, I am aware that law enforcement identified a photograph of an individual of a person who appeared to be CO-CONSPIRATOR 1 posing with an ISIS flag along with three other individuals. Further, law enforcement identified a photograph of an individual who appeared to be CO-CONSPIRATOR 1 standing in what appeared to be an airplane restroom taking a self-portrait with his cell phone in his left hand and pointing upward with his right index finger. In addition, I am aware that on or about October 4, 2024, CO-CONSPIRATOR 1 stated, in a direct message to JIMENEZ-GUZEL on Social Media Platform 2, "hella Isis tho [sic] who scaped [sic] to Europe and Turkey," to which JIMENEZ-GUZEL responded, "Turkey a lot...Southern Turkey." Later that same day, CO-CONSPIRATOR 1 said to JIMENEZ-GUZEL, "Wallah I want to jihad." In addition, I am aware that in 2025, CO-CONSPIRATOR 1 and JIMENEZ-GUZEL communicated regarding engaging in violent attacks and their desire to travel abroad to join terrorist groups.

1's hometown, but that he first started speaking with JIMENEZ-GUZEL online. Co-Conspirator 1 explained to UCE-1, "it's all like through online with all these brothers and social media really backfired...b]ro, it's like it all started when the Gaza thing happened – started...a few years ago, like everyone, like we knew, like were making group chats, so it's like all the Middle Eastern guys, you know what I mean?" Co-Conspirator 1 told UCE-1 that JIMENEZ-GUZEL had gone to the residence of one of the individuals who was recently arrested in Dearborn.

201. Co-Conspirator 1 also told UCE-1 that JIMENEZ-GUZEL was probably being "watched," and that JIMENEZ-GUZEL told him, Co-Conspirator 1, that it would be the last week that JIMENEZ-GUZEL would be seeing his family.

202. Additionally, Co-Conspirator 1 told UCE-1 that Co-Conspirator 3 was leaving "today,"⁷⁶ and was likely being watched as well. Further, Co-Conspirator 1 told UCE-1 that it was "stressful; it's hard doing like the daily things here, knowing we're about to go...I don't know when group two is going to go, but there's a lot of brother in our group from Europe too." Co-Conspirator 1 explained to UCE-1 that JIMENEZ-GUZEL was going to "see what's going on and let us know." According to Co-Conspirator 1, "I think they're going directly to sham because they have drivers that they're paying to like smuggle them."

203. Co-Conspirator 1 also told UCE-1 that he was concerned about talking to anyone over the phone because of being monitored. Co-Conspirator 1 additionally told UCE-1 that he planned on creating a cryptocurrency wallet to help finance his travel.

204. On or about November 3, 2025, a complaint charging JIMENEZ-GUZEL's associates located in Dearborn with a violation of Title 18, United States Code, Section 924(h) (receiving and transferring, and attempting to transfer firearms and ammunition and having reasonable cause to believe that the firearms and ammunition would be used to commit a Federal crime of terrorism) was unsealed in the Eastern District of Michigan ("the EDMI complaint"). JIMENEZ-GUZEL's

⁷⁶ On or about November 3, 2025, Co-Conspirator 3 confirmed, in a group chat with JIMENEZ-GUZEL, MIRREH, CHS-2, and others on Messaging Application 2 that he had arrived in Turkey. Co-Conspirator 3 asked CHS-2 for contact information for an individual who could facilitate Co-Conspirator 3's travel into Syria.

activity in connection with the criminal conduct charged was set forth in detail in the EDMI complaint.

205. Shortly after this conversation between CO-CONSPIRATOR 1 and UCE-1 on November 2, 2025 and the unsealing of the EDMI complaint on November 3, 2025, JIMENEZ-GUZEL, MIRREH, and their co-conspirators accelerated their travel plans.

206. On November 3, 2025, JIMENEZ-GUZEL re-booked his flight from Newark Liberty Airport to Istanbul, Turkey to depart instead on or about November 5, 2025 (in the early morning hours, shortly after midnight on November 4, 2025).

207. Also, on or about November 3, 2025, law enforcement became aware that Co-Conspirator 2 traveled from Sweden to Turkey. On Messaging Application 2, Co-Conspirator 2, in sum and substance, told CHS-2 that he had traveled to Turkey and that he was awaiting further assistance to enter Syria.

208. On or about November 3, 2025, during a call on Messaging Application 2, JIMENEZ-GUZEL told CHS-2 that he was aware of the EDMI complaint. JIMENEZ-GUZEL stated:

There's a lot of urgent stuff we need to speak about...We need to speak; it's very urgent...so you know what happened in Dearborn?...are names are in the...thing [the EDMI complaint]. The feds are gonna be looking for us in a week maybe, so we are leaving today or tomorrow...we are leaving, akhi, immediately...we have a new ticket, we got one today...we are all leaving soon...five of us are in the article and the feds..they're gonna be looking for us soon. IF we don't leave, we are cooked. We are done...tomorrow, we are leaving. We are gonna be in Turkey tomorrow...We're gonna delete everything off of our phones except your contact...you're gonna be the middle-man...They have warrants. They're looking for us right now. We need to leave urgently before this gets bigger...I'm deleting all my apps...I'm gonna change your name on my phone so it seems like you're a normal dude...I'm gonna delete our messages...I know those ikhwa [brothers]. They connect you...If one brother gets caught, all of them get caught...They were planning to do something. I'm not gonna say what, but do

something here. I used to speak with those ikhwa [brothers], basically. They arrested them, and they are going for us as well, so we need to leave immediately and urgently...I need to leave. I need to get out right now...

209. JIMENEZ-GUZEL further told CHS-2 that as a result, he and others including Co-Conspirator 3 would be traveling to Turkey as early as the following day. According to JIMENEZ-GUZEL, the plan was: “[Co-Conspirator 3], [Co-Conspirator 2], and [Co-Conspirator 7] they arrive first. These three people are gonna arrive first and then me and [MIRREH] arrive a day later.”

210. On or about November 4, 2025, lawfully obtained records from Messaging Application 4 revealed that JIMENEZ-GUZEL and MIRREH were in communication with each other beginning at approximately 1:48 a.m. (EST). Those records also reveal that at approximately 3:32 a.m. (EST), JIMENEZ-GUZEL and MIRREH were in communication with each other and with Co-Conspirator 2.

211. At approximately 6:04 a.m. (EST), law enforcement became aware that MIRREH booked additional travel scheduled to leave Seattle for Istanbul at 10:00 p.m. (PT) on November 5, 2025.

212. In the early morning hours of on or about November 4, 2025, JIMENEZ-GUZEL was seen by FBI surveillance departing his residence in Glassboro, New Jersey, and walking to a bus stop. After waiting, he then got into a vehicle, presumably an Uber, which took him to 30th Street Station, the Amtrak train station in Philadelphia, Pennsylvania. JIMENEZ-GUZEL then boarded a train that took him to Newark Liberty Airport. JIMENEZ-GUZEL was then arrested following his arrival at Newark Liberty Airport, in advance of his booked flight that would depart in the early morning of November 5, 2025.

Later on November 4, 2025, FBI personnel executed a previously authorized search warrant at MIRREH’s residence and conducted a probable cause arrest of MIRREH. Following MIRREH’s arrest, he was advised of his *Miranda* rights and agreed to speak with FBI special agents. During the subsequent interview, MIRREH admitted to possessing a ticket to fly to Istanbul to ultimately travel into Syria for the purpose of joining ISIS as a fighter. MIRREH further stated that his travel plans were made in conjunction with other individuals, including JIMENEZ-GUZEL (who MIRREH knew by JIMENEZ-GUZEL’s known kunya or alias), and had been developed over a number of months.