

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Case No. 25-30673

D-1 Mohmed ALI,
D-2 Majed MAHMOUD

CRIMINAL COMPLAINT

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

On or about the date(s) of September 1, 2025 - October 31, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 924(h)

Receiving and transferring, and attempting and conspiring to transfer, firearms and ammunition knowing and having reasonable cause to believe that the firearms and ammunition would be used to commit a Federal crime of terrorism

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 1, 2025

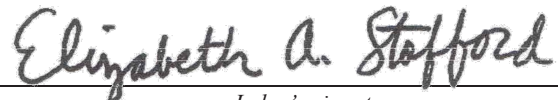
City and state: Detroit, Michigan



Complainant's signature

Nicholas Czech, Special Agent - FBI

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge

Printed name and title

Affidavit in support of a criminal complaint

I, Nicholas Czech, being first duly sworn, hereby state as follows:

Executive Summary

Person 1 (a juvenile) and Mohmed ALI (“ALI”) are U.S. citizens who reside in Dearborn, Michigan. As described further below, Person 1 and ALI were referenced in third-party conversations conducted in July, September, and October 2025 via an encrypted communication application in which other individuals stated that “brothers” to specifically include Person 1 and ALI are planning to conduct a terrorist attack in the United States on behalf of the designated foreign terrorist organization (“FTO”) ISIS. Additional investigative steps by the Federal Bureau of Investigation (“FBI”) have revealed that Majed MAHMOUD (“MAHMOUD”), among others, was a co-conspirator to this attack.

In August and September 2025, at around the same time as the third-party discussions referencing an attack to be carried out by Person 1 and ALI, ALI purchased a shotgun, an AR-15 style rifle, and multiple firearm accessories, including a forced reset trigger that allows a shooter to increase the rate of fire in a semiautomatic weapon. MAHMOUD also purchased an AR-15 style rifle in September 2025, as

well as multiple firearms accessories. Then in October 2025, MAHMOUD purchased over 1,600 rounds of ammunition that could be used in the AR-15 style rifles he and ALI had purchased.

In September and October 2025, Person 1, ALI, MAHMOUD, Co-conspirator 4, and Co-conspirator 5, practiced shooting firearms at gun ranges. Based on my investigative experience, I believe this was to develop their firearms skills in furtherance of an attack. On September 25, 2025, ALI and Co-conspirator 4 practiced shooting at a gun range together, and ALI and Co-conspirator 4 each brought an AR-15 style rifle to the range. ALI and MAHMOUD separately practiced shooting together at a gun range on October 8, 2025. Then ALI, MAHMOUD, and Co-conspirator 4 practiced shooting together on October 16, 2025, and Person 1 practiced shooting at a different gun range on October 17, 2025. Most recently, on October 24, 2025, Person 1, ALI, and Co-conspirator 5 practiced shooting together at a gun range, arriving at the range with an AR-15 style rifle.

In addition to practicing shooting with AR-15 style rifles and other firearms, Person 1, ALI, and MAHMOUD have met on other occasions recently, including at parks in or around Dearborn on multiple nights in

October. On October 10, 2025, Person 1, ALI, and MAHMOUD met in a park and retrieved an object from the trunk of MAHMOUD's vehicle before bringing the object to a wooded area. In addition, based on the information described below, I believe Person 1, ALI, and MAHMOUD traveled together to scout potential attack target locations in Ferndale, Michigan.

Person 1, ALI, MAHMOUD, Co-conspirator 4, and Co-conspirator 5 also regularly communicated with each other and with other individuals who separately indicated that they have knowledge of the potential attack plans and related information. In addition to meeting in person, Person 1, ALI, MAHMOUD, Co-conspirator 4, and Co-conspirator 5 have used online encrypted communications and social media applications to share extremist and ISIS-related materials that encourage attacks similar to what they planned. Further, Person 1 and ALI discussed when to conduct their attack, which they appeared to set for Halloween, and they sought guidance from the father of a local Islamic extremist ideologue (the "Islamic Ideologue") on this question.

Finally, on October 31, 2025, pursuant to federal search warrants, agents recovered, among other things, three AR-15 style rifles, two

shotguns, four handguns, more than 1,600 rounds of ammunition compatible with the three AR-15 style rifles, optical sights, two GoPro cameras, a flash suppressor, tactical vests, and other related firearms parts and accessories at ALI's and MAHMOUD's residences. And in a storage unit rented by ALI and visited by MAHMOUD, agents recovered two more chest rig vests, two black tactical backpacks, and 24 empty magazines compatible with the three seized AR-15 style rifles.

Introduction and background

1. I am a Special Agent, with FBI and I have 13 years of experience in investigations, apprehensions, and prosecution of individuals involved in criminal offenses. I have been employed with the FBI since December of 2022, and I previously worked for the Toledo Police Department for 10 years. I am currently assigned to the Joint Terrorism Task Force ("JTTF"), which investigates terrorists and terrorism. My duties and responsibilities include the enforcement of federal laws and investigating terrorism-related cases.

2. This affidavit is made in support of a criminal complaint against D-1 Mohamed Ismail Ali (ALI) and D-2 Majed Mahmoud (MAHMOUD), alleging that ALI and MAHMOUD violated 18 U.S.C.

§ 924(h), receiving and transferring, and attempting and conspiring to receive and transfer, firearms and ammunition knowing and having reasonable cause to believe that the firearms and ammunition would be used to commit a “Federal crime of terrorism,” namely attempting and conspiring to provide material support or resources to ISIS, a designated foreign terrorist organization, in violation of 18 U.S.C. § 2339B.

3. Pursuant to 18 U.S.C. § 924(h), it is a crime for any individual to knowingly receive or transfer a firearm or ammunition if that individual knows or has reasonable cause to believe that the firearm or ammunition will be used to commit a “Federal crime of terrorism,” which is defined in 18 U.S.C. § 2332b(g)(5) and includes violations of 18 U.S.C. § 2339B. Attempts and conspiracies are also prohibited under 18 U.S.C. § 924(h).

4. This affidavit is based on my personal knowledge, training, and experience, and information I have received from other law enforcement personnel working on this and other national security investigations, and information from other persons with knowledge regarding relevant facts. Because this affidavit is being submitted only

to establish probable cause to believe that ALI and MAHMOUD committed the offense alleged in the complaint, I have not included every fact known to me about this investigation.

Probable Cause

ISIS is a Designated Foreign Terrorist Organization

5. On or about October 15, 2004, the U.S. Secretary of State designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as an FTO under section 219 of the Immigration and Nationality Act (“INA”) and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State (the “Secretary”) amended the designation of AQI as a 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. On or

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

6. On July 4, 2014, at a mosque in Mosul, Iraq, Abu Bakr al-Baghdadi declared himself the Caliph of the Islamic State, which was also known as the Caliphate. Al-Baghdadi also called on Muslims around the world to make “hijrah,” a term that means to immigrate to ISIS territory and join the Islamic State. According to a report published by the United States House of Representatives in 2015, more than 25,000 foreigners traveled to Iraq and Syria and joined ISIS as fighters. This included 4,500 people from Western countries and more than 250 individuals in the United States who joined or attempted to fight with ISIS in combat zones abroad. These foreign fighters were deployed as part of ISIS’s attempt to take over and hold large parts of Syria and Iraq, which was a vital objective of the Caliphate. At its peak, the Islamic State ruled over parts of Syria and Iraq equivalent to the size of the United Kingdom. However, over the ensuing years, the

United States and coalition forces defeated ISIS in several battles and ultimately expelled ISIS from the territory it had conquered, resulting in the defeat and collapse of the Caliphate in 2019. Although ISIS lost most of the physical territory it had conquered, the group continues to conduct terrorist attacks and other operations in Syria, Iraq and around the world. ISIS also continues to pursue the goal of one day re-establishing the Caliphate.

7. Although ISIS has lost most of its territory, its leaders and official ISIS publications have encouraged their supporters to conduct terrorist attacks in the United States and other Western countries. For example, in September 2014, ISIS spokesman Abu Mohammad al-Adnani called for lone wolf attacks using improvised weaponry: “If you are not able to find an IED [improvised explosive device] or a bullet, then single out the disbelieving American, Frenchman or any of their allies. Smash his head with a rock or slaughter him with a knife or run him over with your car or throw him down from a high place or choke him or poison him.”

Co-conspirator 1 and others discuss Person 1 and ALI's plan to conduct a potential U.S.-based attack on behalf of ISIS

8. In 2024, the FBI opened an investigation into a U.S.-based individual ("Co-conspirator 1"). A review of Co-conspirator 1's cellular telephone location data obtained via search warrant showed that Co-conspirator 1's cell phone was in Dearborn, Michigan, from June 30, 2025, to July 2, 2025. This was confirmed by physical surveillance, which showed that Co-conspirator 1 stayed at ALI's residence during that time. Further, messages between Co-conspirator 1 and his brother reference Person 1 possibly picking Co-conspirator 1 up from the bus station after he arrived in Michigan.

9. On or around July 2, 2025, FBI physical surveillance confirmed that Co-conspirator 1 left Dearborn, Michigan, and returned to his U.S. residence. Co-conspirator 1 stayed in the United States for approximately two days before traveling overseas. On August 20, 2025, Co-conspirator 1 arrived back in the United States. Upon his arrival, Co-conspirator 1 was interviewed by Customs and Border Protection ("CBP"), and his phone was reviewed by CBP agents.

10. The contents of Co-conspirator 1's phone revealed Google searches related to "ISIS" and the "Islamic State," and pictures of what appear to be Co-conspirator 1 in military-style clothing with weapons.

11. On July 27, 2025, while Co-conspirator 1 was overseas, he engaged in a group call via an encrypted communication application with approximately five other individuals. Among the participants of this group call was an FBI Confidential Human Source (the "CHS"). The CHS recorded this call, capturing both audio and video. I have reviewed this recording, and the information contained below is based on my review, as well as my training and experience. Person 1, ALI, and MAHMOUD do not appear to have been part of this group call.

12. During the group call, the participants discussed traveling overseas to join Co-conspirator 1 and then later traveling together to Syria to join ISIS. At one point in the conversation, one participant ("Co-conspirator 2") stated that he tried to convince "Athari" and "Bukhari" to join their travel, but Athari and Bukhari said they were going to stay back and do the "same thing as France." Based on this

investigation, I know that “Athari” is Person 1 and “Bukhari” is ALI.¹ I believe that Co-conspirator 2’s reference to doing the “same thing as France” is a reference to the November 13, 2015 ISIS terrorist attacks in Paris, France, because just prior to this comment, Co-conspirator 1 told the group, “Yeah we’re not coming back, bro we are gonna die there [in Syria] Inshallah . . . unless the Amir² sends you to Paris for a 2015 . . .”

13. Co-conspirator 1 then asked if Athari and Bukhari [Person 1 and ALI] were “actually going to do that” [terrorist attack], to which Co-conspirator 2 responded that they would “as soon as we get a commander. If we don’t then they are gonna wait.” I assess that the term “commander” is a reference to an ISIS official or authority granting permission to conduct or facilitate an attack.

¹ For example, Co-conspirator 1 had Person 1’s phone number saved in his phone under “Athari” and ALI’s phone number saved in his phone as “Bukhari.” Further, during the review of Co-conspirator 1’s phone in August 2025, the FBI found several communications on Co-conspirator 1’s phone in which Person 1 refers to ALI as “Bukhari” and Person 1 himself is referenced by his first name and “Athari.”

² In reference to ISIS, an “Amir”, or “Emir,” means a commander or leader.

14. Co-conspirator 1 responded that if “they” [Person 1 and ALI] are going to conduct a terrorist attack, they have to wait until after “we leave,” because he [Co-conspirator 1] was at “their” house and “they are going to know who I am. I’m cooked.”³ Co-conspirator 1 also said that “knowing Athari [Person 1], its [the attack is] probably going to be at like a club, a disco.”⁴

15. On September 22, 2025, another group call took place on an encrypted communication application. Present on this call were, among others, Co-conspirator 1, the CHS, an FBI Undercover Employee (the “UCE”), and an individual the FBI believes is located overseas (“Co-conspirator 3”). The call was recorded by the CHS and included

³ I believe that Co-conspirator 1 is referring to his June 30 to July 2 stay at ALI’s home.

⁴ ISIS has been responsible for previous attacks against clubs, most notably the 2016 mass shooting at the Pulse nightclub in Orlando, Florida, which killed 29 people and the November 13, 2015, attacks in Paris, France, where one group of attackers carried out a mass shooting at a concert at the Bataclan theater, another group of three suicide bombers struck outside the Stade de France, and a third group of attackers fired on crowded cafes and restaurants. One of these attackers also detonated an explosive which killed himself in the process. The coordinated attack killed 137 individuals and wounded 416. As such, I believe that Co-conspirator 1 was referring to a potential attack carried out by Person 1 and ALI when he referenced “it” occurring at a club or disco.

discussion between these individuals, the majority of which was in English. I have listened to the recording of this call, including the portions described below. Person 1, ALI, and MAHMOUD do not appear to have been part of this group call.

16. During the call, Co-conspirator 1 was asked if another member of the group was going to travel with them to Turkey. Co-conspirator 1 replied that the other member planned to travel, but “has to deal with something first.” Co-conspirator 1 then added, “It’s just getting a bit risky for him because . . . I don’t want to say anything on this call but . . . There’s going to be brothers doing something else while we go . . . Like a nice surprise. That’s all I’m going to say . . . So once that happens . . . the, the moment that happens, and if I’m still here then, thing are gonna . . . Basically yeah. So like a lot of stuff is going to be happening . . .” Based on my review of the recording of the call, as well as the individuals who were present and participated, the nature of their conversation, the context of the statements described herein, other information known to me from this investigation, and my training and experience, I believe the “brothers doing something else” whom Co-

conspirator 1 referenced were Person 1, ALI, and, as explained below, MAHMOUD and others.

17. On October 3, 2025, a third group call took place via an encrypted communication application between, among others, Co-conspirator 1, Co-conspirator 2, Co-conspirator 3, the CHS, and the UCE. The CHS also recorded this call, which included discussion between the above-referenced individuals, the majority of which was in English. I reviewed the recording of this call, including the portions described below. Person 1, ALI, and MAHMOUD do not appear to have been part of this group call.

18. During the call, Co-conspirator 1, Co-conspirator 2, and Co-conspirator 3 further discussed their plans to travel to Turkey and ultimately Syria. At one point during the call, Co-conspirator 3 stated, “We could just attend the shooting range once, twice, three times practice with toys a few times . . . it’s all subject to the decisions and the command of the Emir.” Co-conspirator 3 then stated, “I’m even thinking of pulling an Athari [Person 1], but probably not here, probably over there. But now when’s Athari [Person 1] doing his doing his magic? Not magic.” Co-conspirator 2 then responded, “Dude the thing with Athari

[Person 1] is right is um, it would have been bad if I don't know, Subhanallah [Arabic for "glory be to Allah"]. Whatever, whenever we do our thing our first thing then he will do his you know? We're in a great time hey he's doing his thingy they're they're doing their own thingy right they're doing their own thingy. We're gonna give them the Tazkiyah.⁵" Based on this conversation during the October 3, 2025, group call, I believe that Co-conspirator 2 and other members of the group call are aware of Person 1 and ALI's plans to conduct an attack, and that Person 1 and ALI may have knowledge of Co-conspirator 2's and others' plans to travel overseas to join ISIS.

19. In addition, based on Co-conspirator 3's reference to a shooting range immediately before referencing "pulling an Athari," I believe Co-conspirator 3 and the other participants of the October 3, 2025, call have knowledge that Athari (Person 1) is planning to conduct an attack using firearms, as further described below. Finally, based on Co-conspirator 2's other statements, including, "he will do his you

⁵ Based on the nature of the conversation, information I have learned during the course of this investigation, and my training and experience, I believe Co-conspirator 2's reference to "tazkiyah" could refer to an endorsement by a member of ISIS.

know?” and “they’re doing their own thingy . . . ,” I believe that Co-conspirator 2 and the other participants in the group call have knowledge that Athari (Person 1) is a male and that more than one individual will take part in the terrorist attack that Athari (Person 1) intends to conduct.

ALI purchased firearms and accessories shortly after Co-conspirator 1’s visit to ALI’s house and the discussion of the potential U.S.-based attack on behalf of ISIS

20. Based on my training, experience, and investigation in this case, I know that under federal law, one must be eighteen years or older to purchase a rifle, ammunition for a rifle, a shotgun, or ammunition for a shotgun from a federally licensed gun dealer, and twenty-one years or older to purchase any other firearm (including handguns) or ammunition for any other firearm from a federally licensed gun dealer.

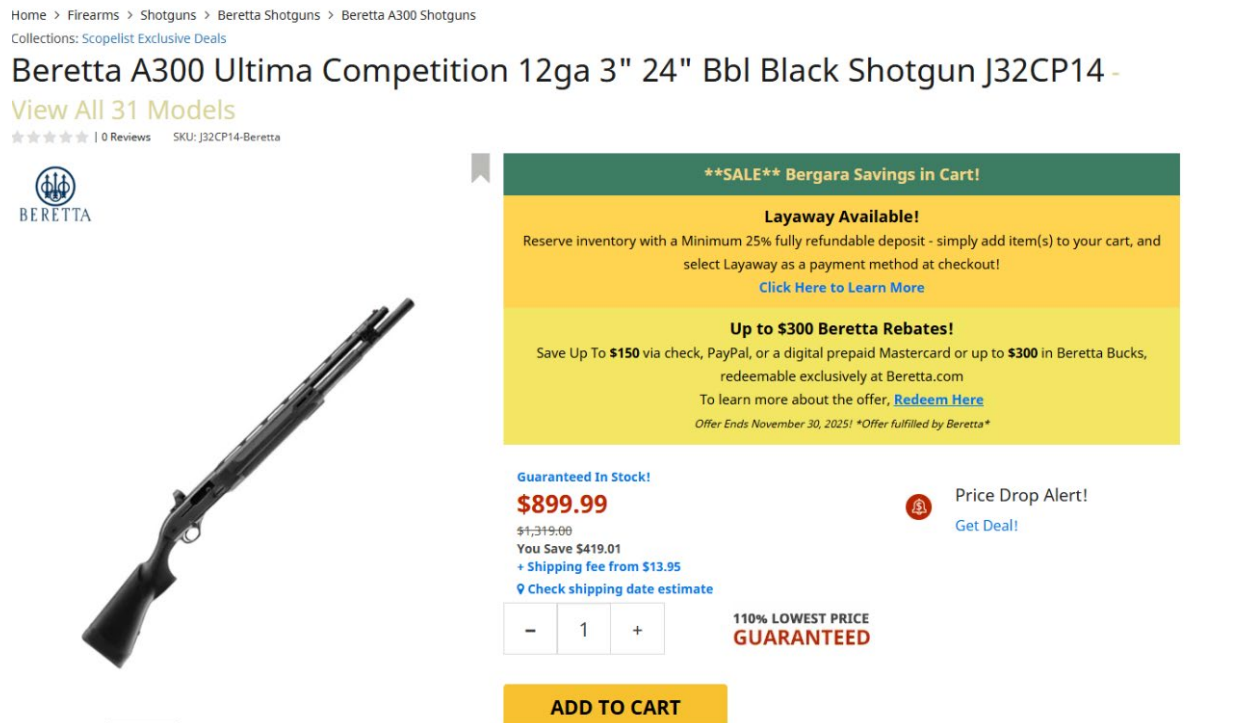
21. As stated above, Co-conspirator 1 came to Dearborn and stayed at ALI’s house from June 30, 2025, to July 2, 2025, and the first call in which Co-conspirator 2 referenced Person 1 and ALI doing the “same thing as France,” assessed to be an attack similar to the November 13, 2015, ISIS terrorist attacks in Paris, France, was on July 27, 2025.

22. According to records provided by the Westland Police Department, ALI has applied for at least four licenses to purchase (“LTP”) firearm purchasing permits since July 14, 2025. Two permits were submitted to the Westland Police Department and two were submitted to the Dearborn Police Department. All four were approved and are still available for use (have not been returned). The address ALI provided on the application to the Westland Police Department was ALI’s residence. According to local law enforcement officers, an LTP which has yet to be returned could be because of three possible reasons:

- a. the license is unused;
- b. the license was used to purchase a rifle/long gun; or
- c. the license was used to purchase a pistol and the required form was not turned in to register the pistol.

23. Federal subpoena returns from JP Morgan Chase Bank associated with an account related to ALI show that he had a debit transaction on August 26, 2025, for \$1,178.89 to Scopelist Online. A representative from Scopelist Online confirmed that on August 24, 2025, ALI placed an order for a Beretta A300 Ultima Competition 12ga 3” 24” Bbl Black Shotgun. The representative stated ALI was charged

on August 25, 2025, and the item shipped on August 27, 2025. The picture below was taken from the Scopelist website and depicts the model of the shotgun purchased by ALI.



24. Data from an email account used by ALI obtained pursuant to a federal search warrant show a screenshot stored on ALI's iCloud account dated September 9, 2025. The screenshot displayed a \$510 financial transaction for the "purchase of EOTech EXPS2 holographic sight and Unity FAST Mount (2.26" height)." The buyer associated with the purchase was listed as "Mohmed Ali" (ALI).

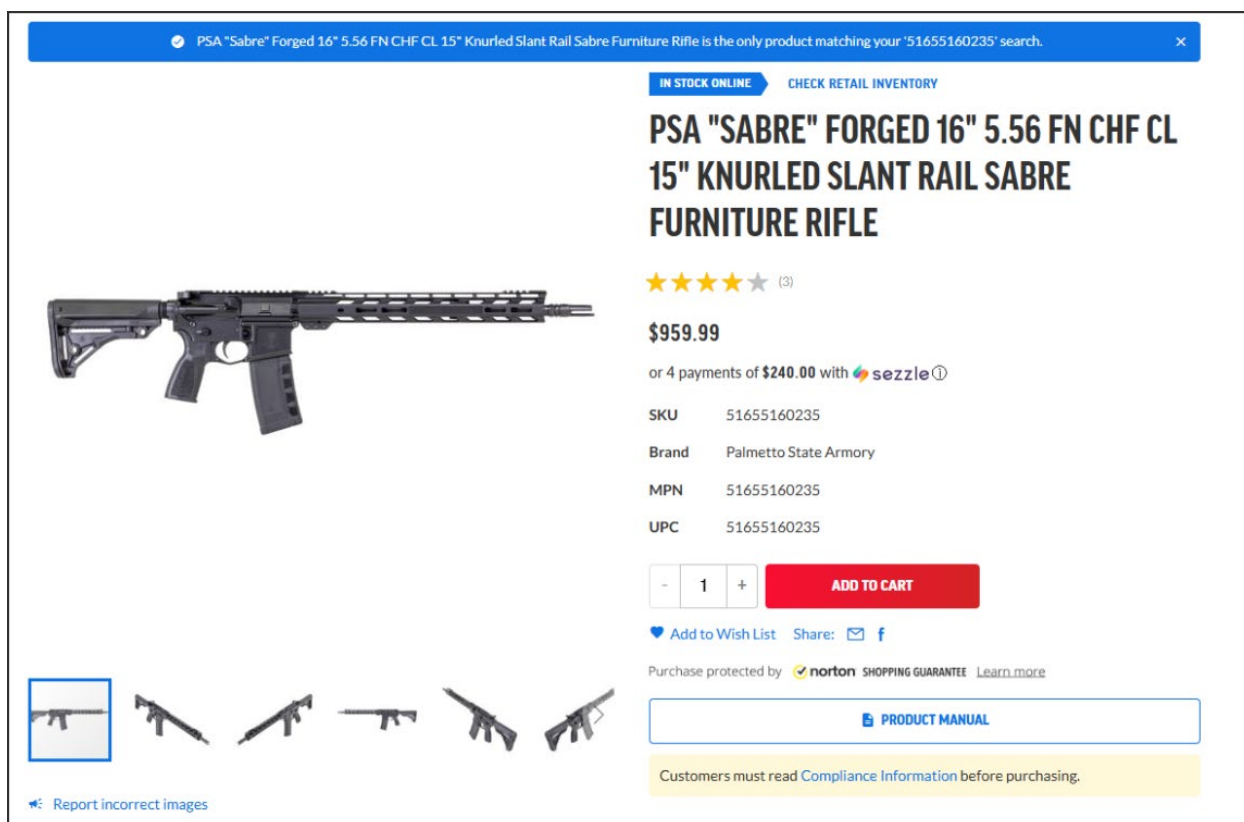
25. The EOTech website (eotechinc.com) describes the EOTech EXPS2 holographic sight as an "operator-grade Holographic Weapon

Sight built for close-quarter engagements with fast moving targets.” An online description from a different retailer that sells this specific sight describes it as giving the shooter “an undeniable tactical advantage over your target” and that it was designed to allow the shooter to quickly and intuitively acquire a target and still perform accurately at any range. Based on my experience and training, and consulting with other FBI agents, and research into historical mass shootings and terrorist attacks, I know that attackers often seek to gain tactical advantages over their targets and victims.

26. Additionally, another picture found in the iCloud returns for ALI’s account revealed a Daniel Defense M4 V7 (“DDM4”) rifle laying on what appears to be a bed. The rifle in the picture appears to be equipped with an EOTech sight, a grip, and a flashlight and/or laser.

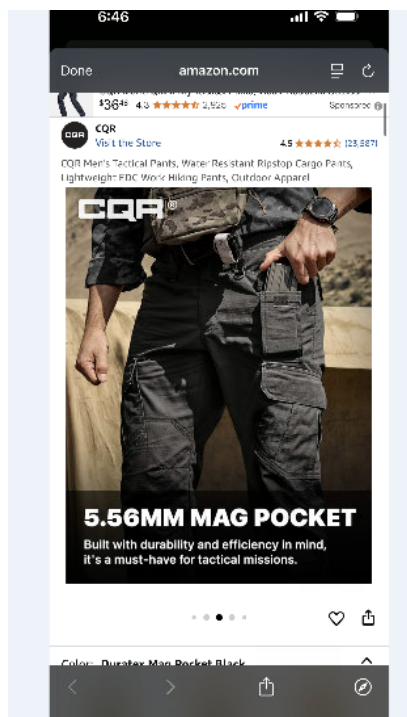


27. Federal subpoena returns from JP Morgan Chase Bank associated with an account related to ALI also show that he had a debit transaction on September 15, 2025, for \$1,037.58 to Palmetto State Armory. Pursuant to federal subpoena returns from Palmetto State Armory, ALI purchased a PSA "Sabre" Forged 16' 5.56 FN CHF CL 15' Knurled Slant Rail Sabre Furniture Rifle on or around September 13, 2025. The picture below was taken from the Palmetto State Armory website and depicts the model of the rifle purchased by ALI.



28. A further review of the iCloud returns revealed a screenshot from Amazon.com. The screenshot depicted tactical-style pants which

include a pocket designed to carry a 5.56mm magazine. I know based on my training and experience, that an AR-15 rifle, like the one purchased by ALI on September 13, 2025, uses 5.56mm ammunition. As such, I believe ALI was looking for tactical style clothing which would allow him to better hold ammunition while carrying out his attack.

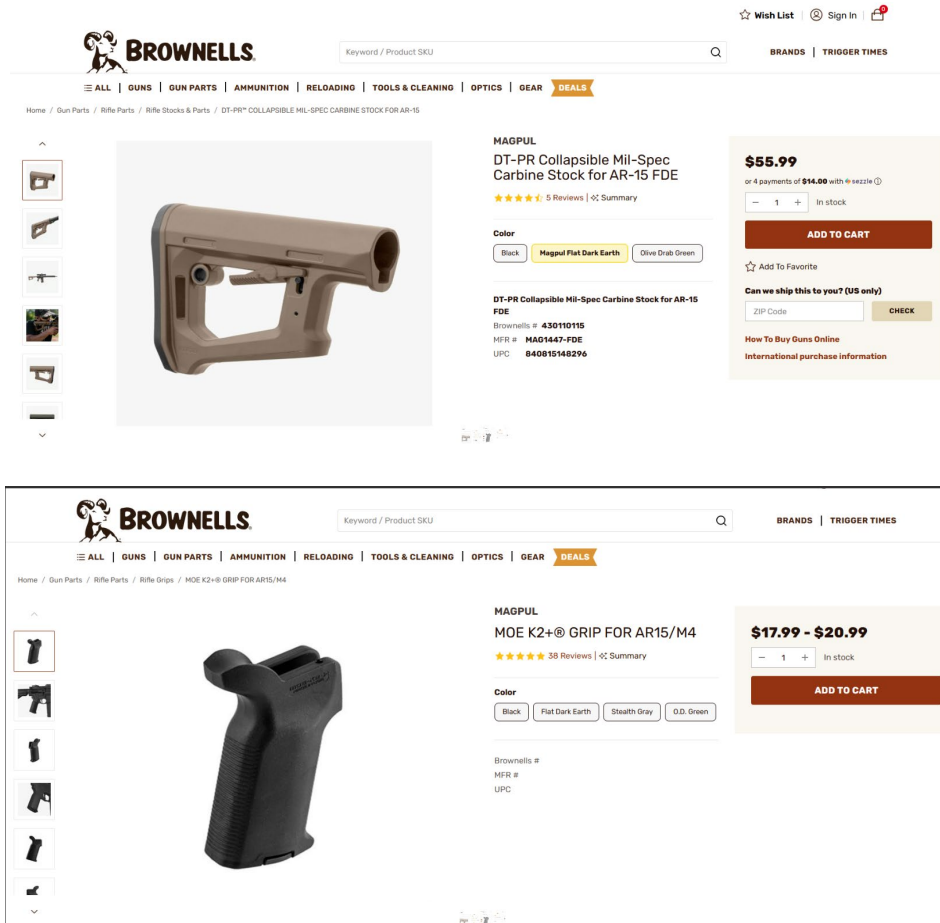


29. ALI's JPMorgan Chase subpoena returns further revealed that ALI made several debit transactions with other firearm vendors on August 29, September 15, September 16, and September 22, 2025. The amounts for these purchases vary from \$27.05 to \$467.05. These transactions include one purchase from Primary Arms on or about September 14, 2025, and purchases from Brownells Inc. on or about

September 15 and 16, 2025.

30. A representative from Primary Arms, a retailer in the firearms industry, confirmed purchases made on September 13, 2025, for a “BCM Gunfighter Vertical Grip Mod 3 – M-LOK – Black,” a “SureFire ProComp Muzzle Break,” and a “Geissele Automatics Super Dynamic 3-Gun AR-15 Trigger – BLEMULA,” for a total of \$467.05. ALI was listed as the billing name for these purchases.

31. A representative from Brownells Inc. confirmed that ALI purchased two items in or around September 15, 2025: a DT-PR Collapsible Mil-Spec Carbine Stock for AR-15 FDE and a MOE K2+® GRIP FOR AR15/M4. According to the Brownells website, a DT-PR “has a contoured butt-pad for improved shoulder purchase and minimal contact with the collar bone, allowing shooters to maintain comfort during heads-up and heads-down shooting with various optics,” and a MOE K2+ Grip “combines reinforced polymer body construction with comfortable, wrap-around rubber overmolding for maximum weapon control in adverse environments.” The two pictures below were taken from the Brownells website and depict the models purchased by ALI.

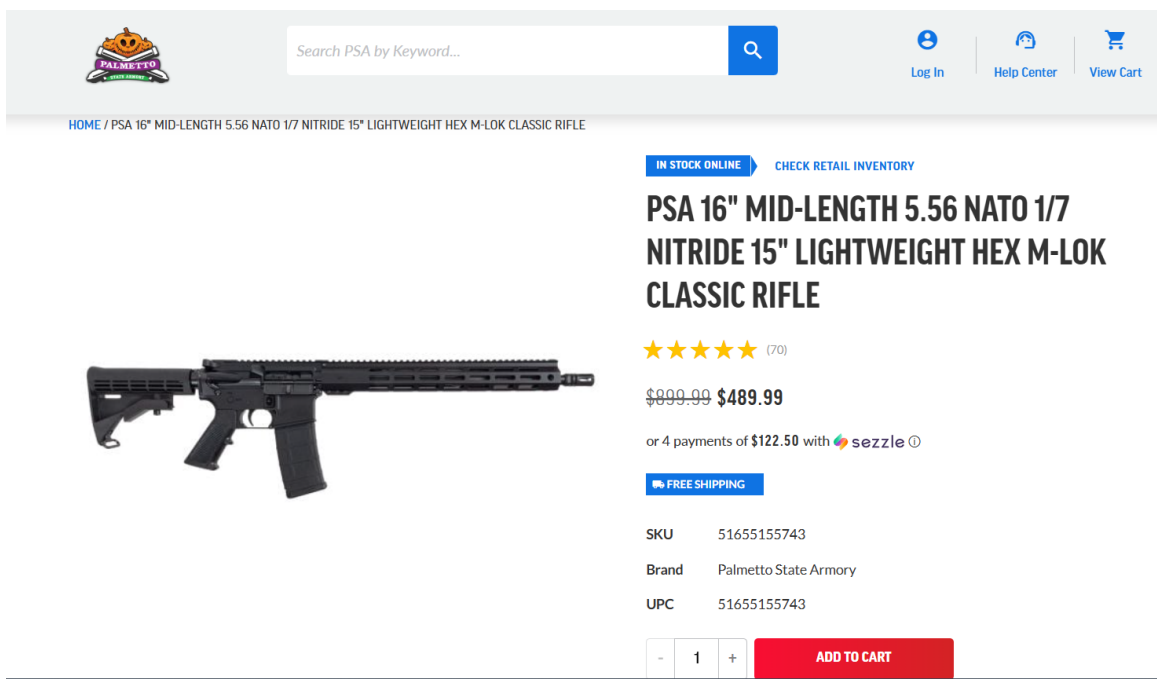


32. A review of ALI's JPMorgan Chase subpoena returns also reveal a \$470 debit transaction to Rare Breed Triggers on September 29, 2025. Per a review of the Rare Breed Triggers website, one of the only products offered on the website is a Forced Reset Trigger ("FRT")-15L3. An FRT increases the rate of fire in a semi-automatic weapon by using the firearm's cycling action to mechanically reset the trigger after each shot.

33. In addition to the firearms ALI recently purchased as described above, as of September 29, 2025, Michigan State records indicate that ALI has one Sig Sauer P365X 9mm pistol, which was registered in May 2024.

MAHMOUD also purchased firearms and accessories after Co-conspirator 1's visit to ALI's house and the discussion of the potential U.S.-based attack on behalf of ISIS

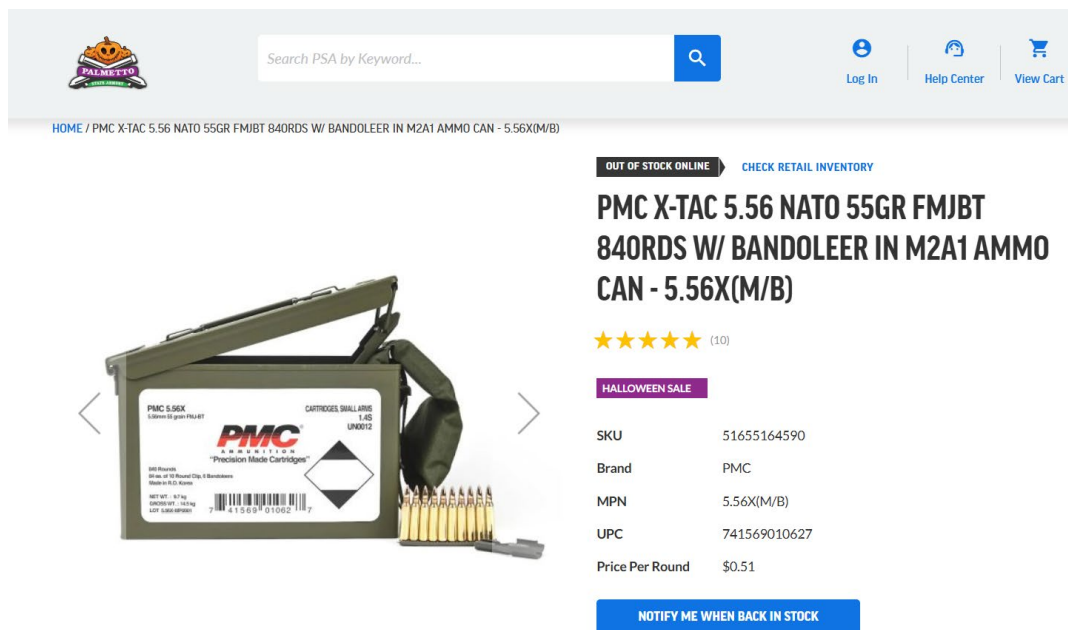
34. Subpoena returns provide by Palmetto State Armory show that on September 26, 2025, MAHMOUD purchased a PSA 16" Mid-Length 5.56 NATO 1/7 Nitride 15" Lightweight Hex M-Lok Classic Rifle. The picture below was taken from the Palmetto State Armory website and depicts the model of the rifle purchased by MAHMOUD.



The screenshot displays the Palmetto State Armory website interface. At the top, there is a navigation bar with the Palmetto State Armory logo, a search bar labeled "Search PSA by Keyword...", and links for "Log In", "Help Center", and "View Cart". Below the navigation bar, a breadcrumb trail reads "HOME / PSA 16" MID-LENGTH 5.56 NATO 1/7 NITRIDE 15" LIGHTWEIGHT HEX M-LOK CLASSIC RIFLE". The main product section features a large image of the rifle on the left. To the right of the image, the product title is "PSA 16" MID-LENGTH 5.56 NATO 1/7 NITRIDE 15" LIGHTWEIGHT HEX M-LOK CLASSIC RIFLE". Below the title, there is a star rating of 5 stars with 70 reviews. The price is listed as "\$899.99" with a strikethrough and "\$489.99" in bold. Below the price, it says "or 4 payments of \$122.50 with sezzle". A blue button labeled "FREE SHIPPING" is positioned below the payment information. To the right of the rifle image, there is a table with product details: SKU (51655155743), Brand (Palmetto State Armory), and UPC (51655155743). At the bottom of the product section, there is a quantity selector showing "1" and a red "ADD TO CART" button.

35. According to records provided by the Dearborn Police Department, MAHMOUD applied for one license to purchase a firearm on October 1, 2025. MAHMOUD was issued a permit to purchase a firearm, and as of October 23, 2025, no return to the issuing police department has been made.

36. Subpoena returns provided by Palmetto State Armory show that on October 5, 2025, MAHMOUD purchased two boxes of PMC X-Tac 5.56 NATO 55gr FMJBT ammunition with 840 rounds in each box (for a total of 1,680 5.56mm rounds). The picture below was taken from the Palmetto State Armory website and depicts the 5.56mm ammunition purchased by MAHMOUD. Tracking data for the package provided by UPS showed that it was delivered on October 9, 2025.



37. Based on my training, experience, and discussions with law enforcement officers involved in this case, I believe that all of the 5.56mm ammunition mentioned in this affidavit, to include the 1,680 rounds that MAHMOUD purchased on October 5, 2025, is compatible with (1) the PSA “Sabre” Forged 16’ 5.56 FN CHF CL 15’ Knurled Slant Rail Sabre Furniture Rifle that ALI purchased from Palmetto Armory on September 13, 2025, (2) the DDM4 rifle discussed and shown above, and (3) the PSA 16” Mid-Length 5.56 NATO 1/7 Nitride 15” Lightweight Hex M-Lok Classic Rifle that MAHMOUD purchased on September 26, 2025 (together, the “ALI and MAHMOUD guns”).

38. Further, again based on my training, experience, and discussions with law enforcement officers involved in this case, purchasing such a large quantity of 5.56mm rounds could indicate that an individual is stockpiling ammunition for an attack.

39. Subpoena returns provided by Amazon show that on or about October 8, 2025, MAHMOUD purchased one OLIGHT Odin S 1500 Lumens MLOK⁶ Rail Mounted WeaponLight Rechargeable

⁶ Open-source research indicates that MLOK is defined as a “Modular Locking System” and further describes it as a mounting interface

Tactical Flashlight with Upgraded Remote Pressure Switch. The billing and shipping name associated with the purchase was MAHMOUD.

40. Based on my training and experience, and consultation with other FBI Agents, I know that using a flashlight while shooting at night or in low light conditions can increase a shooter's overall situational awareness and enhance target identification. From my firearms training while employed as an FBI agent, I know that keeping both hands on a firearm improves the shooter's accuracy. Mounting the flashlight to the weapon's rail mount removes the need for the shooter to hold a flashlight and the firearm in separate hands, but still requires momentarily removing a hand from the weapon to turn the lighting on or off. A weapon-mounted light with a pressure switch, like the one MAHMOUD purchased, increases the shooter's efficiency by allowing the shooter to function the light and the weapon at the same time without moving his hands from the firearm.

designed by Magpul, that can be integrated into the handguard of rifles to allow for mounting accessories to weapons.

41. Subpoena returns provided by eBay show that on October 8, 2025, MAHMOUD purchased a HOLOSUN HS510C Open Reflex Red Dot Sight with HM3X Magnifier Combo.

42. Based on my training and experience, as well as conferring with other FBI personnel, a red dot sight such as the one purchased by MAHMOUD from eBay is often added to a weapon to either supplement or replace the traditional iron sights that are manufactured on the weapon, to provide the shooter a single point of focus during the aiming process. Open-source research indicates that red dot sights are very popular across competitive shooters, hunters, and tactical applications due to increased speed when acquiring a target, and their simplicity when compared to traditional iron sights. A description of this item found from an online retailer indicates that the red dot sight, accompanied with the magnifier, allows the user to quickly adapt to close-quarters and longer-range scenarios.

Person 1, ALI, MAHMOUD, Co-conspirator 4, and Co-conspirator 5 practice shooting at shooting ranges

43. While reviewing data associated with a Pen Register/Trap and Trace (“PRTT”) of ALI’s telephone number, it was discovered that

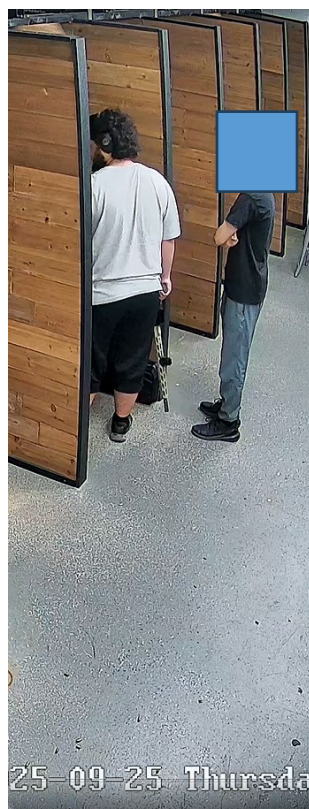
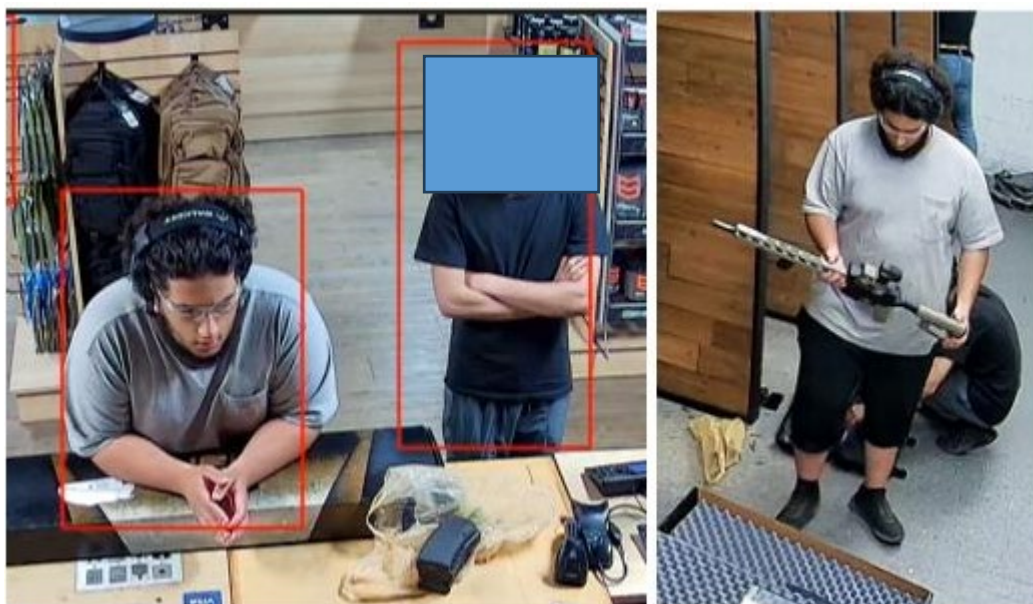
ALI called Downriver Guns, a gun store and range with multiple locations in Michigan, on September 26 and 30, 2025.

44. A receipt and video surveillance footage voluntarily provided by Downriver Guns shows that ALI and Co-conspirator 4 were present on September 25, 2025, at the Belleville, Michigan location. The receipt shows that ALI purchased two J-N targets, two FIOCCHI AMO 5.56 NATO 55GR FMJBT 50-RD boxes of 5.56mm ammunition,⁷ one hour of range time, and that ALI paid for a second shooter on the lane rental that day.

45. A review of the September 25, 2025, Downriver Guns surveillance footage by an FBI agent shows that ALI and Co-conspirator 4 each brought an AR-15 style rifle, one of which was identical to the PSA “Sabre” Forged Rifle that ALI purchased from Palmetto State Armory on September 13, 2025. A review of the surveillance footage further indicates that both ALI and Co-conspirator 4 fired these weapons at the range on September 25, 2025.

⁷ The 5.56mm ammunition purchased by ALI at Downriver Guns is compatible with AR-15 style rifles, including the ALI and MAHMOUD guns.

46. Pictured below is ALI, dressed in a grey-colored shirt, and Co-conspirator 4, dressed in a black-colored shirt, while at Downriver Guns on September 25, 2025.



47. Downriver Guns provided another receipt indicating that ALI visited the Belleville Downriver Guns location on October 8, 2025. The receipt shows that ALI purchased two J-N targets, six PPU PPRM5561 Rangemaster 5.56x45mm NATO 55 Gr Full Metal Jacket Boat Tail (FMJBT) 20 Bx/50 Cs boxes of 5.56mm ammunition,⁸ and one hour of range time, and that ALI paid for a second shooter on the lane rental that day. Associated waiver information and video surveillance footage voluntarily provided by Downriver Guns to the FBI confirmed the second shooter on the lane rental with ALI was MAHMOUD. The video surveillance footage also shows that ALI again brought his own AR-15 style rifle to shoot that day. Pictured below is ALI, dressed in a grey-colored shirt, and MAHMOUD, dressed in a black-colored shirt, while at Downriver Guns on October 8, 2025.

⁸ The 5.56mm ammunition purchased by ALI at Downriver Guns is compatible with AR-15 style rifles, including the ALI and MAHMOUD guns.



48. On October 16, 2025, the FBI was notified that ALI, MAHMOUD, and Co-conspirator 4 visited Downriver Guns again. While they were at Downriver Guns, they purchased 5.56mm ammunition⁹ and J-N targets, and rented time for a shooting lane. According to the receipts provided by Downriver Guns, they did not rent any weapons. That MAHMOUD purchased 5.56mm ammunition at the range seven days after the 1,680 5.56mm rounds he purchased online were delivered to him is further evidence that his bulk purchase of

⁹ The 5.56mm ammunition purchased by ALI, MAHMOUD, and Co-conspirator 4 at Downriver Guns is compatible with AR-15 style rifles, including the ALI and MAHMOUD guns.

5.56mm rounds online could indicate that MAHMOUD, ALI, and Person 1 are stockpiling that ammunition for an attack.

49. I know based on my training and experience that individuals plotting terrorist attacks may practice shooting firearms of the same or similar type that they intend to use during the attacks they intend to carry out. For example, a video obtained by ABC News showed one of the perpetrators of the 2015 San Bernardino ISIS-inspired attack, Syed Farook, practicing with a pistol and assault rifle at a local firing range two days before his attack, which killed 14 people and wounded 26 others. The attackers were armed with assault rifles and pistols. As described in a California Governor's Office of Emergency Services After Action/Corrective Action Report and according to the FBI's investigation, the perpetrators of the attack had become radicalized over several years prior to the attack and had amassed a large stockpile of weapons, ammunition, and bomb-making equipment in their home.

50. Records associated with Person 1's phone number show that he called Top Gun Shooting, Downriver Guns, and Range USA Southgate on October 16, 2025.

51. On October 17, 2025, FBI physical surveillance observed Person 1 and three other individuals (unrelated to this affidavit) go to Downriver Guns in Brownstown Township, Michigan. Based on receipts and surveillance video provided by an employee of Downriver Guns, Person 1 and the other individuals rented a Glock handgun, an AR-15 style rifle, and a semi-automatic shotgun, and purchased two boxes of 9mm Scorpio 115 GR FMJ ammunition, ten boxes of Scorpio 223REM 55GR FMJ ammunition (20 rounds per box),¹⁰ two boxes of Winchester X12RS15 Super-X Rifled slug hollow point 12 gauge 2.75" ammunition, and one hour of range time. I have reviewed surveillance video from Downriver Guns that depicts Person 1 firing what appears to be a semi-automatic shotgun.

52. Two FBI agents, who did not identify themselves to Person 1 or the other individuals accompanying him, and who were in unmarked clothing, intentionally placed themselves near Person 1 and the three other individuals while they shot at the range on October 17, 2025.

¹⁰ Based on my training, experience, and discussions with law enforcement officers involved in this case, I know that the firearms purchased by ALI and MAHMOUD are capable of firing this .223 ammunition.

These agents observed Person 1 shoot the Glock 45 handgun, the semi-automatic shotgun, and the AR-15 style rifle that he and the other individuals rented.

53. On October 24, 2025, Person 1, ALI, Co-conspirator 5, and the same individual who previously accompanied Person 1 to the gun range on October 17, 2025, arrived at the Downriver Guns firing range in Belleville, Michigan.

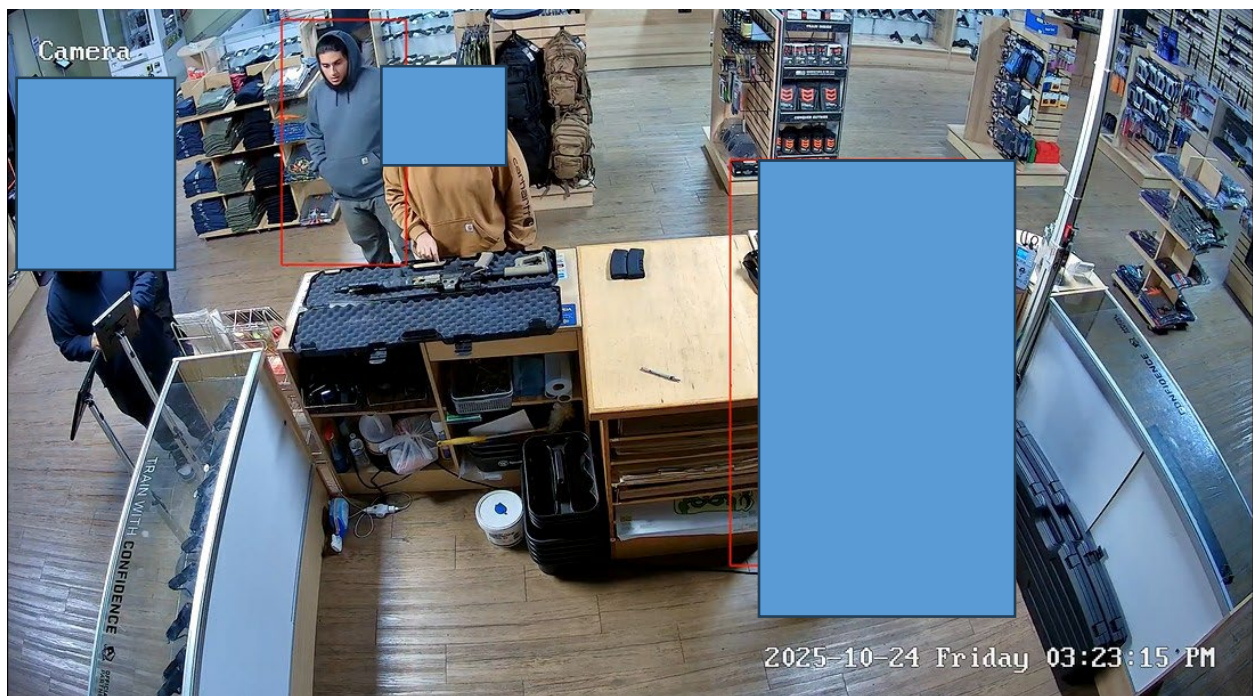
54. An employee of the location voluntarily provided the FBI a copy of the sales receipts for their visit as well as video surveillance from inside the store. The receipts confirm the rental of a pistol, an AR-15 style rifle, two lane rentals, and the purchase of three FIOCCHI AMO 5.56 NATO 55GR FMJBT 50-RD boxes of 5.56mm ammunition.¹¹

55. Video surveillance footage from inside the store and FBI surveillance confirm that ALI again brought his own AR-15 style rifle (the Sabre purchased from Palmetto State) to shoot that day. Video surveillance also captured ALI removing two loaded 5.56/.223

¹¹ The 5.56mm ammunition purchased by the four people on October 24, 2025, at Downriver Guns is compatible with AR-15 style rifles, including the ALI and MAHMOUD guns.

magazines from the case holding his AR-15 style rifle while standing in the store.

56. The below photograph shows Person 1, ALI (in a hooded sweatshirt), Co-conspirator 5, and the same individual previously mentioned standing in the store on October 24, 2025. Person 1 is standing in the brown sweatshirt with ALI's AR-15 style rifle in front of him. ALI's loaded 5.56/.223 magazines are visible on the counter to Person 1's left.

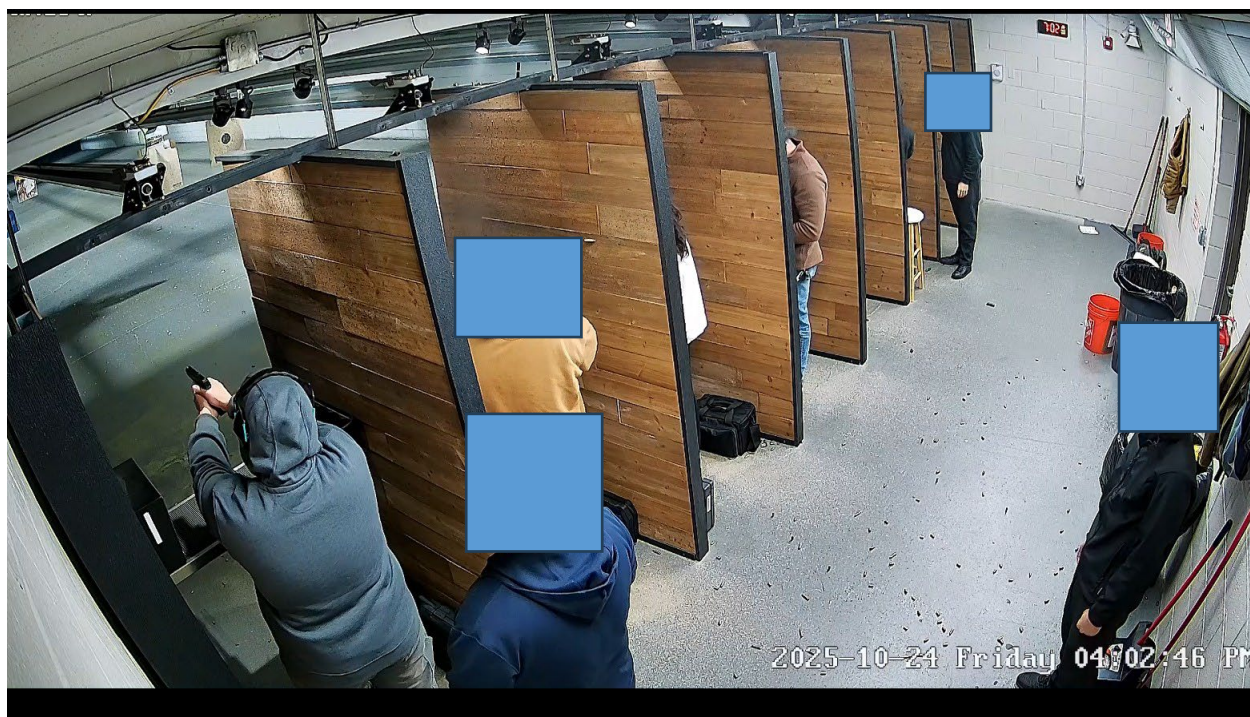


57. Two FBI agents, who did not identify themselves to Person 1, ALI, Co-conspirator 5, and the same individual previously mentioned, and who were in unmarked clothing, intentionally placed themselves

near Person 1, ALI, and the two other individuals while they shot at the range on October 24, 2025.

58. A review of the in-store surveillance footage reveals that Person 1 and ALI fired the AR-15 style rifle that ALI brought with him to the range on October 24, 2025. This was confirmed by the two FBI agents in the range with Person 1 and ALI at the time.

59. The below photograph shows Person 1 in the brown sweatshirt firing ALI's AR-15 style rifle on October 24, 2025.



Person 1, ALI, and MAHMOUD travel to an area in Ferndale, Michigan, known for its clubs and discos

60. Law enforcement obtained federal search warrants for call detail records associated with Person 1, ALI, and MAHMOUD's known phone numbers.

61. An analysis of the timing advance records for Person 1 and ALI's phones revealed that on September 19, 2025, Person 1's phone traveled to the area of ALI's residence and remained there from approximately 7:25 PM to 9:50 PM. Person 1 and ALI's phones then moved to the area of Hemlock Park in Dearborn, Michigan, and remained there from approximately 9:50 PM to 11:20 PM, before traveling to downtown Ferndale, Michigan, from approximately 11:45 PM to 12:05 AM. At approximately 12:28 AM, Person 1 and ALI's phones arrived back in the vicinity of ALI's residence. The records show that Person 1's phone arrived back at his (Person 1's) residence at approximately 12:37 AM on September 20, 2025. Timing advance records for MAHMOUD's phone reveal that MAHMOUD was also in the vicinity of downtown Ferndale, Michigan, from approximately 11:45 PM, September 19, 2025, until 12:04 AM, September 20, 2025. Based on these records, I assess Person 1, ALI, and MAHMOUD were either co-

located or located in the same vicinity of downtown Ferndale during the evening of September 19, 2025.

62. On September 20, 2025, at approximately 10:00 PM, the same timing advance records reveal that Person 1's phone was in the vicinity of ALI's residence until approximately 10:15 PM. The phone data showed Person 1 and ALI's phones then traveled around Dearborn to Melvindale, then to downtown Ferndale, where both phones remained from approximately 11:36 PM to 12:01AM on September 21, 2025. Person 1 and ALI's phones then traveled back to the vicinity of ALI's residence at approximately 12:17 AM. Person 1's phone arrived back at the area of his (Person 1's) residence at approximately 12:25 AM on September 21, 2025.

63. Based on another FBI agent's review of the pole camera footage that was originally placed outside of Person 1's residence on or about August 17, 2025, Person 1's trips on September 19 and 20, 2025, are outside of his (Person 1's) normal pattern of travel.

64. Based on the information provided above, I believe that on the evenings of September 19 and 20, 2025, Person 1 traveled to pick up ALI at ALI's residence, drove to downtown Ferndale, and then returned

to drop off ALI at his (ALI's) residence before Person 1 returned to his (Person 1's) residence. I also believe that MAHMOUD either joined Person 1 and ALI in Ferndale or was located in the same vicinity of downtown Ferndale during the evening of September 19, 2025.

65. The area in Ferndale to which Person 1 and ALI traveled on both September 19 and 20, 2025, and MAHMOUD traveled on September 19, 2025, includes numerous bars and restaurants, including three bars/clubs identified by the FBI based on this data. All three of these clubs are located on Woodward Avenue near East Nine Mile. Many of the clubs and bars in this area intentionally attract members of the LGBTQ+ community.

66. Given that Person 1, ALI, and MAHMOUD are all under twenty-one-years old and based on what I have learned during this investigation, I believe it is unlikely Person 1, ALI, and MAHMOUD would have traveled to this area at this time to patronize these clubs or drink alcohol.

67. As referenced above, Co-conspirator 1 stated, "knowing Athari [Person 1], it's [the attack is] probably going to be at like a club, a disco." As such, I believe the September 19 and 20, 2025 trips

described above could be attempts by Person 1, ALI, and MAHMOUD to “scout” locations of a possible attack before carrying it out.

Person 1, ALI, and MAHMOUD meet in person at other locations in October

68. On October 10, 2025, at approximately 8:00 PM, FBI physical surveillance observed Person 1 and ALI at Hemlock Park in Dearborn. After spending some time at Hemlock Park, Person 1 and ALI drove in ALI’s vehicle to Chase Bank on Ford Road and then returned to Hemlock Park. MAHMOUD’s known vehicle then arrived at Hemlock Park at approximately 9:00 PM. FBI physical surveillance observed three individuals appearing to match the physical description of Person 1, ALI, and MAHMOUD at the park during this time. FBI physical surveillance observed that, at one point, one of the individuals took something out of the trunk of MAHMOUD’s vehicle and then all three headed back to a wooded area of the park with the object. Prior to 10:00 PM, ALI’s vehicle departed the park, presumably with ALI, Person 1, and MAHMOUD inside. FBI physical surveillance did not determine whether Person 1, ALI, and MAHMOUD returned to MAHMOUD’s vehicle from the wooded area with the object retrieved

from the trunk, or whether that object was later brought to one of the residences associated with Person 1, ALI, or MAHMOUD.

69. On October 15, 2025, FBI physical surveillance observed Person 1, ALI, and MAHMOUD drive in MAHMOUD's vehicle around Dearborn, Michigan. While driving around, MAHMOUD's vehicle briefly pulled over. Person 1 was observed opening the trunk of MAHMOUD's vehicle and reentering the rear-driver's side. Approximately forty-minutes later, either ALI or MAHMOUD exited the passenger side of the vehicle and briefly opened and closed the trunk before reentering the vehicle and departing. Approximately two minutes later, MAHMOUD's vehicle arrived in the vicinity of Person 1's residence.

70. On October 18, 2025, at approximately 5:35 PM, FBI physical surveillance observed Person 1 leave his residence and walk south along his residential street where he entered ALI's vehicle. ALI and Person 1 then drove in the vicinity of MAHMOUD's residence. MAHMOUD's vehicle later arrived near ALI's vehicle. MAHMOUD was observed exiting his vehicle and entering ALI's vehicle. Together, Person 1, ALI, and MAHMOUD then drove to Bisher Market in

Dearborn before traveling to Lapeer Park in Dearborn at approximately 6:40 PM. The three were observed sitting at a park bench under a pavilion and later in the lawn north of the pavilion. At around 8:00 PM, the three returned to ALI's vehicle and drove away.

71. I know based on my training and experience that people will often meet in person to discuss illegal activities for the purposes of evading audio surveillance by law enforcement, or in this case, possibly to avoid eavesdropping from their family members. Since Person 1, ALI, and MAHMOUD live in residences they share with their families, I believe that Person 1, ALI, and MAHMOUD's visits to Hemlock Park and Lapeer Park on October 10 and 18, 2025, respectively, reflect their efforts to meet to plan an attack without being detected.

Person 1, ALI, MAHMOUD, Co-conspirator 4, and Co-conspirator 5 regularly communicate using WhatsApp, an online encrypted communications application

72. In addition to meeting in person, I believe that Person 1, ALI, and MAHMOUD, as well as Co-conspirator 4 and Co-conspirator 5, regularly communicate via at least one online encrypted communications application, WhatsApp. Based on my training and experience, I know WhatsApp is an online encrypted communications

application allowing users to call and send messages to other users, and users may use WhatsApp on their cell phones or other electronic devices. A review of federal court authorized PRTT records associated with Person 1's WhatsApp account reveals a group conversation including Person 1, ALI, MAHMOUD, Co-conspirator 4, and Co-conspirator 5. As of October 28, 2025, there were approximately 125 communications within this group from September 26, 2025, through at least October 26, 2025. The senders of these communications are both Person 1 and ALI and include a mixture of texts, URLs (website links), images, and videos.

73. The dates of these communications begin following ALI's purchase of weapons and continue through the in-person meetings between Person 1, ALI, and MAHMOUD, as well as ALI, MAHMOUD, Person 1, Co-conspirator 4, and Co-conspirator 5's trips to the gun ranges.

74. The WhatsApp PRTT records associated with Person 1's account reveal multiple communications from Person 1 to the group from October 17, 2025 (the day of Person 1's first visit to the gun range described above) to October 26, 2025.

Person 1 and ALI separately communicated regarding a planned attack on behalf of ISIS and have sought guidance from the father of a local Islamic extremist ideologue as to when to conduct their attack

75. In addition to the online communications between Person 1, ALI, MAHMOUD, and others described above, since at least October 2025, Person 1 and ALI have discussed an “attack” that may take place on “pumpkin” (“Halloween”) or other dates, based on court-authorized surveillance.¹²

76. On October 17, 2025, ALI told Person 1, “We’ve got some new plan for real—for real . . . We’re gonna talk with Majed [MAHMOUD] and we [unintelligible (hereinafter, “UI”)] . . .” Person 1 then asked, “Is there a new plan or it’s just like . . .” and ALI responded, “Aha . . . some of the same old, same old maybe . . .” ALI and Person 1 then had the following exchange regarding their “plan” for which Person 1 intended to visit a gun range with others in order to “learn how to shoot”:

- Person 1: Is it anything changing with the . . .

¹² The quotations contained in this affidavit **(in this section and elsewhere)** are based on preliminary FBI transcriptions and, in some cases, include preliminary translations of certain words or phrases from Arabic to English.

- ALI: No, no, [UI] God willing. We will still talk [UI]
- Person 1: No, I need to know now . . . Is there anything changing with the . . .
- ALI: No, no, no change.
- Person 1: So just the . . .
- ALI: We're gonna do it . . . We're gonna do it the big 2035 [laughs]
- Person 1: Are you serious?
- ALI: No. don't worry.
- Person 1: So, it's the same everything, just different like, you know.
- ALI: Uh, same thing. We'll talk God willing. Me and [UI] we talked about it . . . Uh . . . I mean it's—it's trust. Look, after today you guys are going to the range [UI] one hundred percent right?
- Person 1: Aha . . . God willing.
- ALI: When you go, God willing, you going, will also be another factor to prove like the change. It will all make sense later. But you just try to shoot, just learn how to shoot. It's not as easy as you think.

77. As described above, later that same day, Person 1 traveled with three other individuals to Downriver Guns in Brownstown Township and practiced shooting with an AR-15 style rifle, a shotgun, and a handgun.

78. In a conversation the next day, on October 18, 2025, ALI told Person 1 that he had a dream involving an interaction between ALI and Person 1's father that occurred after ALI dropped off Person 1 at Person 1's house following a visit to a gun range. Person 1 then said to ALI that he (Person 1) wants to talk with ALI and Co-conspirator 4 and Co-

conspirator 5. Person 1 said that “Majed” (MAHMOUD) seems confident, but other days he is “geeking out.” Then both Person 1 and ALI agreed that MAHMOUD is “fine now.” Person 1 then said to ALI, “Imagine if you extend, by Allah it will only make things worse.” ALI responded that he would like to hold a “Shura council” to make a decision,¹³ and that he wanted to see how MAHMOUD would act. ALI also said, “Tell him [MAHMOUD] this, it’s on this, we are going back to this pumpkins.” Based on the context of this conversation and additional information as described below, I believe that ALI and Person 1 were potentially referring to an attack that they would carry out on or around Halloween when they referenced “pumpkins.”

79. Later in that same conversation, Person 1 told ALI that he will speak to Co-conspirator 4 and Co-conspirator 5 and that he did not think they would want to delay either. ALI also asked Person 1 if Person 1 told anybody about “the date, the thing.” Person 1 asked ALI,

¹³ Based on my training and experience, I am aware that a “Shura council” often refers to an advisory or consultative council. In this context, I believe that ALI used “Shura council” to refer to a meeting or discussion with Person 1, MAHMOUD, and potentially Co-conspirator 4 and Co-conspirator 5.

“You mean brothers online?” and ALI responded affirmatively. Then Person 1 responded, “No, I never told anyone regarding that day. By Allah, that day. Any day specifically, I never told anyone. The only person who knows something is [Co-conspirator 1]¹⁴ and you know what he knows, he doesn’t know nothing.” Person 1 then stated that he told Co-conspirator 1 that he would do something in a year or “God knows when,” but that Person 1 does not want to wait that long. After further discussion, ALI told Person 1 that “there are other things they can add,” but Person 1 responded, “I don’t like to wait. We already agreed on this day, keep it on this day.”

80. Based on the fact that Person 1 used Co-conspirator 1’s known kunya, as well as the context of this discussion—including ALI and Person 1’s reference to a potential attack that is consistent with what Co-conspirator 2 told others in the online group call with Co-conspirator 1 on July 27, 2025 about Person 1 and ALI wanting to do “the same thing as France”—I believe that in this exchange, Person 1 told ALI that Co-conspirator 1 has knowledge concerning the attack

¹⁴ Person 1 used a known “kunya” or alias of Co-conspirator 1.

that Person 1 and ALI are plotting, but that Co-conspirator 1 did not know the specific date of the attack.

81. Before the conversations described above, Person 1 and ALI spoke on October 15, 2025. In one exchange that day, Person 1 told ALI that he was fearful. ALI responded, “The way I see it, is that . . . this is the closest I am to deciding, like, that I am going to paradise, God willing. If I die any other way, then knowing you, ten times more scared that you are going to Hell, you understand?” Person 1 then responded, “Yeah, that is true, good, God willing.” In a separate exchange on October 15, 2025, Person 1 told ALI that he would cease taking certain medication because he wanted to avoid stomach problems. Person 1 also said that he is “good,” because he has seven more days before the medication will leave his system, then another eight days after that.

82. Based on the date of Person 1’s statements on October 15, 2025, I believe that Person 1 was indicating that he would avoid any complications associated with this particular medication in fifteen days or on October 31, 2025, which is Halloween. In multiple other communications, Person 1 and ALI also reference “pumpkin.” For instance, during an exchange with Person 1 on October 22, 2025, ALI

sang in a mocking tone, “I gotta do the pumpkin for real . . . if [UI] don’t do the pumpkin I’m gonna slit my wrists.” Based on these statements, I also believe that when Person 1 and ALI referred to “pumpkins” or “pumpkin” in these and other exchanges, they were referring to Halloween as the potential day for the attack they were plotting, an attack that they understood could result in their deaths and martyrdom.

83. In another conversation on October 19, 2025, Person 1 insisted that their plan should remain as is and he told ALI, who appeared to reference another potential attack date, “The thing is that your day is too close—close—too close to a red line.” ALI asked what Person 1 meant by “too close to a red line” and ALI responded that it is “like too close to some . . .” Shortly thereafter, Person 1 stated, “No point in extending it, it’s not that deep,” and ALI responded, “. . . it is, because you only get one chance at this.” Person 1 stated, “Yeah, I only get one chance, it’s just this and I want to do it in the safest way possible,” and ALI responded, “Yeah, yeah [UI] in the best way possible, [God willing].”

84. Later during the same conversation, Person 1 again stressed his view that they should not delay, stating, “bro I just don’t see the benefit in delaying it. I am not going to lie . . . It’s not worth, uh, delaying it, that’s what I am trying to say, I think the reward is still there, still need . . .” ALI then said, “I am thinking like—it’s going to be five tough guys and going to . . . five tough guys that just go into it . . .” At around the same time, Co-conspirator 4 can be heard yelling in the background, “[I swear to God], no, [I swear to God].” Shortly thereafter, Person 1 stated, “I should have never even [UI] on this Halloween thing, even been in the first place [by God], you should have never done that, we would never been in this [UI]. The day you brought it up and I shut it down in the car, was the best thing that, uh, I did; and I am retarded for bringing it back up. You are the idiot; you are the idiot that brought it back up and made me like think about it.” Still arguing that they should not delay, Person 1 went on to say, “bro, Mohmed [ALI], [by God] it’s not worth it, I am telling you, you guys just worry too much, you are thinking of [UI], you have a group and an operation and that, and that it’s going to be huge, it’s going to be fine, it’s going to go and then that’s it.”

85. Based on the context of the October 19, 2025, conversation described above, including the references to an “operation,” “Halloween,” “five tough guys,” and because Co-conspirator 4 can be heard in the background, I believe that ALI and Person 1 were discussing the potential date on which Person 1, ALI, MAHMOUD, Co-conspirator 4, and Co-conspirator 5 would engage in their planned attack.

86. In another conversation on October 19, 2025, Person 1 and ALI again referenced “pumpkin” and Person 1 told ALI to “change it back.” ALI then told Person 1 “that isn’t happening” and said, “if that happens, the thing is you won’t know once you see it on the news, the open news.” In the same exchange, ALI said that he does not believe “Majed” [MAHMOUD] “would do that” and “that if Majed [MAHMOUD] wants God to accept his Shahadah [martyrdom] then he cannot throw four brothers in jail.” Based on my training and experience and the context of this exchange, I believe that ALI was saying that MAHMOUD would not inform law enforcement regarding their planned attack because MAHMOUD also sought martyrdom.

87. Then on October 24, 2025, Person 1 asked ALI, “Are you gonna do pumpkin?” and ALI responded, “I would love to, you know by God, by God genuinely, deep in my heart by God I would love to.” Person 1 then stated, “Think about it, there won’t be a day left for [UI] a big attack, operation of the Ummah [Muslim nation] . . . and if someone else offer to make another day and claim every day of the year . . . when they claim every day of the year, that brother did it on that day, we got to do it another day.” ALI responded, “Imagine weddings back to back. Wow, how beautiful, back to back uh whatever uh, cakes. Beautiful, woohoo, anniversary for real.” Based on my training and experience and the context of this exchange, I believe that Person 1 was referring to attacks when he referenced “weddings” and “cakes.” I also believe that Person 1 was indicating that if enough other ISIS supporters carry out attacks, there will be anniversaries of such ISIS attacks on every day of the year.

88. Later in that same exchange on October 24, 2025, Person 1 told ALI, “So ya, I talked to my brothers. We are going to do pumpkin.” Person 1 then says, “I talked to . . . [Co-conspirator 4] and [Co-conspirator 5], they said it is getting bad. So we got to do pumpkin,

ya.”¹⁵ Based on the Arabic word Person 1 used for “brothers” and the context, I believe that Person 1 was referring to other ISIS supporters, including individuals with whom Person 1 has communicated online, like Co-conspirator 1, as well as Co-conspirator 4 and Co-conspirator 5, whom Person 1 names specifically.

89. On October 26, 2025, ALI told Person 1 that he was cleaning his rifle, to which Person 1 responded, “Oh, you mean my rifle.” Based on the context of this conversation, which occurred two days after Person 1, ALI, and Co-conspirator 5 went to the Downriver Guns shooting range and Person 1 practiced shooting with ALI’s AR-15 style rifle, I believe that Person 1 and ALI were describing Person 1’s receipt and ALI’s transfer of ALI’s AR-15-style rifle at the range on October 24, 2025, as well as on a future date or dates for their planned attack.

90. Finally, on October 28 and 29, 2025, Person 1 and ALI discussed Person 1’s effort to seek guidance from the father of the

¹⁵ On October 23, 2025, the day before this exchange, based on information received from a federal subpoena to Spirit Airlines, ALI purchased plane tickets for himself, Co-conspirator 4, and Co-conspirator 5 to fly to New York City from Michigan on November 10, 2025, with a return ticket for the following day.

Islamic Ideologue who is publicly known for his radical Islamic views and his vocal support of Islamic extremist ideology consistent with that of ISIS.¹⁶ As described further below, Person 1 has posted content from this same Islamic extremist ideologue on his Instagram account, thus demonstrating that Person 1 is aware of and supports the Islamic Ideologue's views.

¹⁶ Based on my training and experience and from conferring with other FBI personnel, I am aware that the Islamic extremist ideologue has publicly proclaimed his support for the Islamic extremist ideology espoused by ISIS. In 2014, the International Center for the Study of Radicalization ("ICSR") published a report indicating that the Islamic Ideologue was influential in providing legitimacy for ISIS among its foreign fighters and the report referenced direct contacts between this individual and those ISIS fighters. The ICSR report also notes that its analysis of social media accounts assessed to be used by foreign fighters in Syria, most of whom were believed to be ISIS members, revealed that 1.25 percent of his interactions on Twitter were with foreign fighters in Syria and that 60 percent of foreign fighters in Syria with Twitter accounts followed the Islamic Ideologue on Twitter. The ICSR stated that the Islamic Ideologue "does not openly incite his followers to violence nor does he explicitly encourage them to join the Syrian jihad," but that "he adopts the role of a cheerleader" and his views "can easily be interpreted as offering support, encouragement, justification, and—particularly given his status as a religious leader—legitimacy for the decision to join a jihadist group in Syria. The Islamic Ideologue also issued a series of "Tawheeds (sermons)" that were available on his YouTube channel, including sermons that appear to blame non-believers for perceived harms to Muslims and justify attacks by Muslims on non-believers.

91. On October 29, 2025, Person 1 called the father of the Islamic Ideologue and told him that he (Person 1) “had an intention to do [a] good deed and I was indecisive. I don’t know what day to do it. Maybe in a couple of months or earlier, a month.” After both the father and Person 1 shared prayers, Person 1 said, “I decided to go with the later date” and that he had a dream about a week prior in which he was doing “the exact deed.” The father of the Islamic Ideologue then told Person 1 that Person 1 should not wait and should do the “good deed now.”

92. Then Person 1 told ALI in a separate conversation on October 29, 2025, that he called the father of the Islamic Ideologue, who Person 1 said told him, “If there is something good, do it right away.” Person 1 referenced his dream and ALI responded, “If you have seen it then you do it” and “that one was clear and I was so happy about it.” Person 1 then stated, “I wanted to ask him or you call him and ask him,” and ALI asked, “ask about the pumpkin? What are you saying?” Person 1 responded, “No, I just asked him ‘how do you know if the dream is answered?’ I told him I got a dream that pretty much like what you told me, I had a dream of doing a good deed and it was earlier

than when I decided and wait for his answer.” After Person 1 described his call with the Islamic Ideologue’s father to ALI, ALI indicated that he would call MAHMOUD. In a subsequent exchange, ALI told Person 1 that if the Islamic Ideologue’s father knew about the actual plan to which ALI and Person 1 had agreed, the Islamic Ideologue’s father would not have said what he did when Person 1 asked him about the timing of doing a “good deed.”

93. Based on my training and experience, information known to me from this investigation and provided by others at the FBI regarding the Islamic extremist ideologue whose father Person 1 spoke to on October 28, 2025, and the context of the subsequent exchange between ALI and Person 1, I believe that Person 1 told ALI that he had consulted the father of the Islamic Ideologue for guidance as to when to conduct their planned attack and that based on the Islamic Ideologue’s father’s guidance, Person 1 and ALI decided that they should not wait to carry out their attack, and that ALI would tell MAHMOUD.

ALI rented a U-Haul storage unit in Inkster, Michigan, in September 2025

94. On or about October 22, 2025, the FBI received federal search warrant returns for an iCloud account associated with ALI. The

review found that in or around mid-September 2025, ALI downloaded a U-Haul (rental company) application using his Apple account.

95. U-Haul records provided pursuant to a federal subpoena showed that on September 23, 2025, at around the same time he began purchasing firearms and firearms accessories as described above, ALI rented a 4x6x8 storage unit. In addition, Co-conspirator 4 is listed as the alternate contact with authorized access to the storage unit.

96. Access logs provided by U-Haul revealed that the storage unit was first accessed on September 23, 2025, from approximately 5:43 PM until 5:48 PM. A review of the call detail records associated with ALI's known phone number revealed that ALI's phone utilized a tower in the immediate vicinity of the Inkster, Michigan, U-Haul facility on September 23, 2025, from approximately 5:32 PM through 5:55 PM.

97. Video footage provided by U-Haul pursuant to a federal subpoena reveals a man similar in appearance to ALI and driving ALI's vehicle in the vicinity of the storage unit on September 23, 2025.

98. The logs further revealed the storage unit was accessed on September 28, 2025, at approximately 9:20 AM. A review of the call detail records associated with ALI's known phone number for

September 28, 2025, revealed that ALI's phone utilized a tower in the immediate vicinity of the Inkster, Michigan, U-Haul facility on September 28, 2025, from approximately 9:15 AM through 9:25 AM.

99. Lastly, the logs revealed that the storage unit was accessed on October 9, 2025, from approximately 9:12 PM. A review of the call detail records associated with both ALI's known phone number and MAHMOUD's known phone number reveal that both ALI's phone and MAHMOUD's phone utilized a tower in the vicinity of the Inkster, Michigan, U-Haul facility on October 9, 2025, from approximately 9:08 PM until 9:22 PM.

Person 1, ALI, and MAHMOUD share Islamic extremist content on their online social media accounts

100. The FBI's review of Person 1's public-facing social media profiles and associated social media activity reveals content featuring individuals who promote, or otherwise support, ISIS, terrorist suicide attacks, terrorists, and martyrdom.

101. In September 2024, Person 1 admitted in an interview to law enforcement to belonging to three chat groups on Discord, an online communications application, in or around June 2024, chat groups in which participants discussed ISIS and extremism. One of the Discord

chat groups to which Person 1 belonged was called “Islamic State Lasting,” whose users frequently posted pro-ISIS videos and propaganda. Person 1 was also asked about his membership in a second chat group called “Islamic State of America” and Person 1 said that the name sounded familiar but that he could not remember. On or about June 7, 2024, through June 12, 2024, an FBI Online Covert Employee (“OCE”) collected screenshots from social media platforms of ISIS supporters. Based on the OCE’s reporting, the membership of the pro-ISIS Islamic State of America chat group included a Discord username known to be used by Person 1. From a voluntary disclosure provided by Discord, I know that one member of the Islamic State of America group posted in the group about conducting an attack against the Chicago Pride (LGBTQ+) Parade on June 8, 2024. Specifically, the member stated, among other things, that “InshaAllah We will be att@cking the Chicago pride parade with a backpack 🌟,” and “We are planning on starting with a couple small attacks to get noticed and then start growing from there inshaallah.” Based on my investigation in this case, this information is consistent with Person 1, ALI, and MAHMOUD scouting possible LGBTQ+-friendly attack locations in Ferndale.

102. Person 1 also said that the Islamic State Lasting chat group had about 20 active members and 50 inactive members. Person 1 said that his role in the chat group, which was assigned by someone else, was “potential mujahid.” Based on my training, experience, and investigation in this case, I know that ISIS members and supporters often use the term mujahid to mean a holy warrior engaged in violent jihad.

103. Further, on September 11, 2025, a review of Person 1’s previously public facing Instagram profile with username “athararchlve” revealed that Person 1 had posted a video to his account of a “goodbye message” from an Al-Qaeda suicide bomber prior to blowing himself up. Person 1 posted the video with the comment “Forgive me.”

104. I believe Person 1’s “athararchlve” account was likely shut down by Instagram. On September 23, 2025, I found what I believe to be Person 1’s new Instagram account, with username “athararchve,” by searching for accounts with similar usernames to the account which was shut down.

105. A review of the new, “athararchve” Instagram account revealed the same video of the Al-Qaeda suicide bomber was posted to this account with the comment “Nasheed¹⁷ for my beloved mother.”

106. Additional posts made to the “athararchve” account include videos of Osama Bin Laden and Anwar Awlaki,¹⁸ as well as content featuring the local Islamic Ideologue whose father Person 1 contacted on October 28, 2025, and who is further discussed in footnote 17, above.

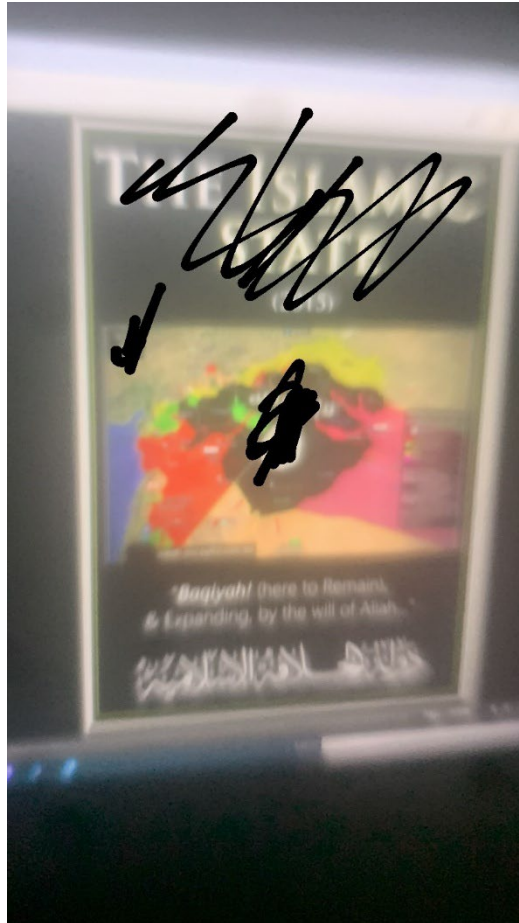
107. In September 2025, the FBI received federal search warrant returns for Person 1’s previous Instagram account, “athararchlve.” A review of these returns revealed that Instagram accounts associated

¹⁷ A nasheed is a religious song. Jihadist nasheeds glorify jihad, the supposedly divinely sanctioned “just battle” of good against evil. Jihadist nasheeds are deliberately couched in the legitimate religious genre of the Islamic nasheed, which has been popular for decades, if not centuries. Violent terrorist organizations, like ISIS and Al-Qaeda, have strategically used nasheeds in their propaganda, indoctrination tactics, and global appeal, especially by means of social media and other internet tools.

¹⁸ Anwar Al Awlaki was an American Yemeni radical Islamic cleric and leader in the designated FTO Al-Qaeda in the Arabian Peninsula (“AQAP”) who was killed in 2011. Using online media outlets, including his online magazine “Inspire,” Awlaki actively recruited and instructed followers to carry out attacks against Western targets. As discussed below, Person 1 also shared an electronic folder that likely contained copies of Inspire on an online communications platform on October 21, 2025.

with at least Person 1, ALI, and MAHMOUD participated in an Instagram chat group starting in or around April 2025.

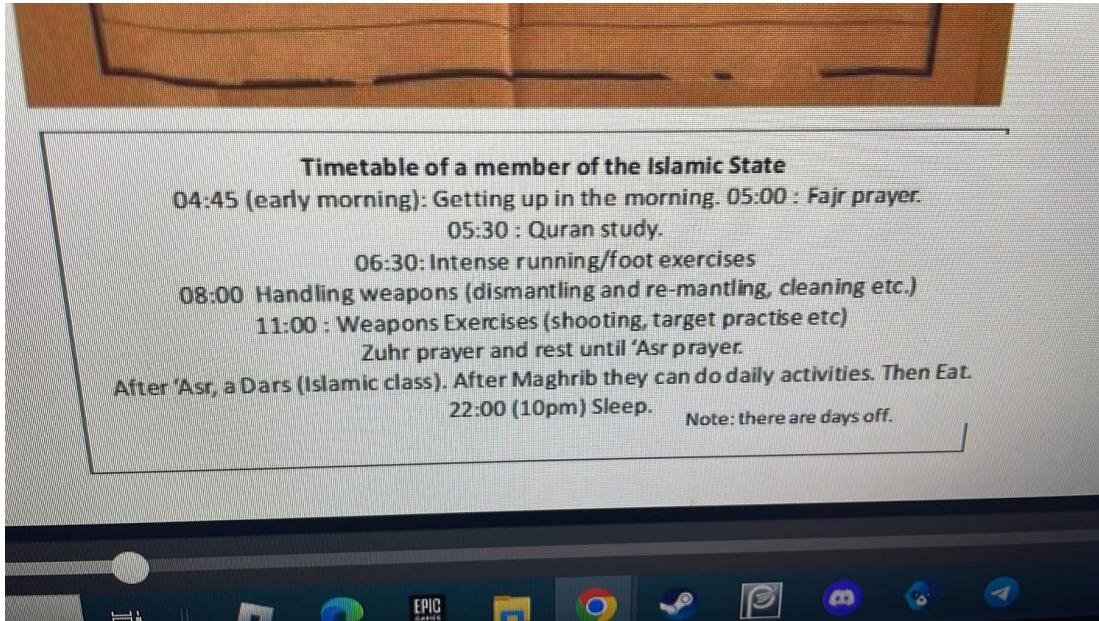
108. A review of this Instagram chat group from the search warrant returns for Person 1's prior Instagram account found that on April 8, 2025, the Instagram account associated with MAHMOUD sent the group a picture of an online book entitled "The Islamic State (2015)" (depicted in the screenshot below). I know this account belonged to MAHMOUD because in October 2025, the FBI received subpoena returns from Meta requesting basic subscriber information for any accounts associated with an e-mail address that MAHMOUD is known to use. The cover of the book appears to display a map of the Middle East with a black-colored territory in the middle, assessed to be the territory once held by the Islamic State (ISIS). The title of the book and a portion of the map are intentionally blacked out.



109. An additional picture sent by MAHMOUD to the group on April 8, 2025, displayed a map of the world with red-colored arrows pointing to Syria. The title of the picture was “Infograph: Muhajireen (emigrants) to the Islamic State.”



65



111. In addition, pursuant to search warrants executed on October 31, 2025, the FBI searched an iPhone belonging to Co-conspirator 5. This search revealed a Telegram channel in which Person 1 uploaded digital copies of 14 “Dabiq” magazines and 13 “Rumiyah” magazines on or about October 23, 2025. Based on my training and experience, I know that Dabiq and Rumiyah are English-language online magazines published by ISIS and popular with ISIS supporters. I also know that Dabiq and Rumiyah contain articles encouraging and instructing their supporters to carry out violent attacks in the United States and elsewhere.

112. Pursuant to Instagram records obtained by federal search warrant, ALI’s Instagram account also contained Islamic extremist and

ISIS-related content. For example, ALI's Instagram account contained a lecture by Anwar Al Awlaki saved on September 12, 2025, a video saved in May 2025 of an ISIS judge and legal theorist killed in Syria in 2017, and videos of one of the 9/11 hijackers (saved on September 12, 2025) and a video of the first 9/11 tower collapsing (saved July 25, 2025).

113. Over the course of the investigation, the FBI also found that since at least January 2025, Person 1 has communicated online with another individual who self-identified as a prisoner in the “muhajirin” section of the Al Hol internally displaced persons camp in Syria. Based on my training and experience and information known to me from this investigation, I know that the term “muhajirin” refers to an individual who emigrated to ISIS-held territory for the purposes of joining and supporting ISIS.¹⁹ Based on this, I believe that Person 1 knew he was communicating with a member of ISIS in these communications.

¹⁹ See Maren Hald Bjørgum, *Jihadi Brides: Why do Western Muslim Girls Join ISIS?* (October 2016), available at https://www.globalpoliticsreview.com/publications/2464-9929_v02_i02_p091.pdf (“They call themselves muhajirin, female migrants, and speak of the need...to join the land of Islam”).

114. Person 1 initially communicated with the Syria-based individual using Instagram from January 2025 to approximately August 5, 2025, at which point they moved their communications onto the encrypted communication platform WhatsApp. Based on PRTT records, Person 1 and the Syria-based individual communicated over WhatsApp until at least October 27, 2025.

115. During his communications with the Syria-based individual, Person 1 voluntarily created another social media account for the purposes of promoting and fundraising on behalf of this individual. I also found that from approximately March 2025 through August 2025, Person 1 successfully utilized this social media account to send money to this individual.

Evidence seized on October 31, 2025

116. On October 29, 2025, the Honorable Curtis Ivy, Jr. authorized search warrants associated with this investigation. In ALI's residence, officers seized, among other things: the DDM4 AR-15 style rifle with an attached optic, EOTECH red-dot sight, and pressure switch (appearing to match the photo of the DDM4 found in ALI's iCloud account, as referenced above); a Palmetto State Armory AR-15

style Sabre rifle (appearing to match the rifle ALI purchased on or about September 13, 2025) with an unattached EOTECH red-dot sight and Olight tactical flashlight; eight 5.56mm extended magazines; a Beretta 12 gauge shotgun with an attached Holosun optic; two loaded, Sig Sauer 9mm pistols; a CZ 9mm pistol with two empty magazines; a black flash suppressor; two GoPro cameras; a Survivor HK-695 stainless knife with black sheath; a tactical flashlight; an opened UPS package addressed to Co-conspirator 4 containing an AR-15 firearm stock; an opened UPS package addressed to Co-conspirator 4 containing a JP Enterprises Silent Captured Spring and Geissele Automatics trigger components; a box addressed to Co-conspirator 4 containing two black Rapid Response tactical vests with magazine holders; and an Amazon box addressed to Co-conspirator 5 containing a weapon sight, tactical flashlight, Holosun optic, sling mount, and laser.

117. In MAHMOUD's residence in his bedroom, agents seized, among other things: a Palmetto State Armory PA15 multicaliber AR-15 style rifle (appearing to match the rifle MAHMOUD purchased on September 26, 2025); a box with two containers of 5.56mm ammunition containing approximately 1,680 rounds (appearing to match the

ammunition MAHMOUD purchased on October 5, 2025); two rifle magazines with ammunition; five opened rifle magazines and five unopened rifle magazines without ammunition; a Mossberg 12 gauge shotgun loaded with five slugs; additional shotgun slugs; a USPS package addressed to MAHMOUD containing a JP Enterprises Silent Captured Spring and a Geissele Automatics Super Dynamic 3 Gun AR-15; and a gear package with a tactical chest rig. Elsewhere in the house, officers found a loaded Smith & Wesson handgun.

118. In the U-Haul storage unit rented by ALI and visited by MAHMOUD, agents seized two chest rig vests that can hold ammunition magazines; two black tactical backpacks; two receipts dated September 21, 2025, from Range USA that show a purchase of 30 rifle magazines for an AR-15 style rifle; and 24 AR-15 style magazines. The magazines located in the storage unit are compatible with the AR-15 style rifles that ALI and MAHMOUD purchased, and that Person 1, ALI, and MAHMOUD shot at shooting ranges as described above. These magazines also can hold the 5.56mm ammunition that MAHMOUD purchased in bulk in early October 2025. Pictures of the magazines and chest rig vests found in the storage unit are shown below.



CONCLUSION

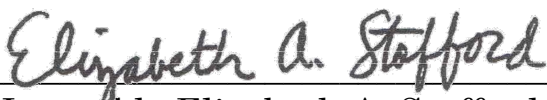
119. Based on the information above, there is probable cause to believe that, within the Eastern District of Michigan, ALI and MAHMOUD violated 18 U.S.C. § 924(h), receiving and transferring, and attempting and conspiring to receive and transfer, firearms and

ammunition knowing and having reasonable cause to believe that the firearms and ammunition would be used to commit a Federal crime of terrorism.

A handwritten signature in black ink, appearing to read "Nicholas Czech", written over a light gray rectangular background.

Nicholas Czech
Special Agent, FBI

Subscribed and sworn to before me in my presence and/or by reliable electronic means.

A handwritten signature in black ink, reading "Elizabeth A. Stafford", written over a light gray rectangular background.

Honorable Elizabeth A. Stafford
United States Magistrate Judge

Dated: November 1, 2025